DOCUMENT RESUME

ED 226 249 CE 035 246

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TITLE	Cooperate with Governmental and Community Agencies. Module LT-F-4 of Category F--School-Community Relations. Competency-Based Vocational Education Administrator Module Series.
INSTITUTION	Ohio State Univ., Columbus. National Center for Research in Vocational Education.
SPONS AGENCY	Consortium for the Development of Professional Materials for Vocational Education.
REPORT NO	ISBN-0-89606-117-5
PUB DATE	83
NOTE	93p.; For related documents see CE 035 239-251 and note on ED 212 839.
AVAILABLE FROM	American Association for Vocational Instructional Materials, 120 Driftmier Engineering Center, Athens, GA 30602 ($6.00; complete set--$151.80).
PUB TYPE	Guides - Classroom Use - Materials (For Learner) (051)
EDRS PRICE	MF01/PC04 Plus Postage.
DESCRIPTORS	*Administrator Education; *Agency Cooperation; Case Studies; Competency Based Education; Educational Cooperation; Educational Legislation; Federal Legislation; *Government School Relationship; Higher Education; Individualized Instruction; Institutional Cooperation; Job Skills; Learning Activities; *Management Development; Postsecondary Education; *Public Agencies; School Administration; Secondary Education; State Legislation; *Vocational Directors; Vocational Education

ABSTRACT

This module, one in a series of competency-based administrator instructional packages, focuses on a specific competency that vocational education administrators need to be successful in the area of school-community relations. The purpose of the module is to teach administrators how to cooperate with governmental and community agencies, including such tasks as complying with and influencing legislators, developing comprehensive plans, and submitting required forms to teach administrators techniques for fostering cooperative arrangements. An introduction provides terminal and enabling objectives, a list of resources needed, and a glossary of selected terms. The main portion of the module includes four sequential learning experiences. Overviews, which precede each learning experience, contain the objective for each experience and a brief description of what the learning experience involves. Each learning experience consists of a number of activities that may include information sheets, case studies, samples, checklists, and self-checks. Optional activities are provided. The final learning experience also provides an assessment form for administrator performance evaluation by a resource person. (YLB)

ED226249

Cooperate with Governmental and Community Agencies

MODULE
LT-F-4

Module LT-F-4 of Category F—
School-Community Relations

COMPETENCY-BASED VOCATIONAL EDUCATION ADMINISTRATOR MODULE SERIES

Consortium for the Development of Professional Materials for Vocational Education

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The National Center for Research in Vocational Education
The Ohio State University

1983

ISBN 0-89606-117-5

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CE 035 946

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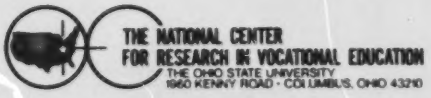
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The work presented herein was performed by the National Center for Research in Vocational Education on behalf of the Consortium for the Development of Professional Materials for Vocational Education. Sponsors and members of the Consortium for 1980-1981 included the following states and/or cooperating agencies: the Florida Department of Education, Division of Vocational Education, and Florida International University, Division of Vocational Education; the Illinois State Board of Education, Department of Adult, Vocational, and Technical Education, and Southern Illinois University at Carbondale; the New York State Education Department, Office of Occupational and Continuing Education; the North Carolina Department of Public Instruction, Division of Vocational Education; the Ohio State Department of Education, Division of Vocational Education; and the Pennsylvania Department of Education, Bureau of Vocational Education, and Temple University, Department of Vocational Education. The opinions expressed herein do not, however, necessarily reflect the position or policy of any of the sponsors, and no official endorsement by them should be inferred.

FOREWORD

The need for competent administrators of vocational education has long been recognized. The rapid expansion of vocational education programs and increased student enrollments have resulted in a need for increasing numbers of vocational administrators at both the secondary and postsecondary levels. Preservice and inservice administrators need to be well prepared for the complex and unique skills required to successfully direct vocational programs.

The effective training of local administrators has been hampered by the limited knowledge of the competencies needed by local administrators and by the limited availability of competency-based materials specifically designed for the preparation of vocational administrators. In response to this pressing need, the Occupational and Adult Education Branch of the U.S. Office of Education, under provisions of part C--Research of the Vocational Education Amendments of 1968, funded the National Center for a scope of work entitled "Development of Competency-Based Instructional Materials for Local Administrators of Vocational Education" during the period 1975-77. That project had two major objectives:

1. To conduct research to identify and nationally verify the competencies considered important to local administrators of vocational education.
2. To develop and field test a series of prototypic competency-based instructional packages and a user's guide. One hundred sixty-six (166) high priority competencies were identified and six prototypic modules and a user's guide were developed, field tested, and revised.

Although six modules had been developed, many more were needed to have competency-based materials that would address all the important competencies that had been identified and verified. In September 1978 several states joined with the National Center for Research in Vocational Education to form the Consortium for the Development of Professional Materials for Vocational Education. Those states were Illinois, Ohio, North Carolina, New York, and Pennsylvania. The first five states were joined by Florida and Texas later in the first year. The first objective of the Consortium was to develop and field test additional competency-based administrator modules of which this is one.

Several persons contributed to the successful development and field testing of this module on cooperating with governmental and community agencies. David R. Greer, Graduate Research Associate, assumed the major responsibility for reviewing the literature and for preparing the actual manuscript. Recognition also goes to the two consultants who helped conceptualize the module and prepared draft materials for the manuscript: Jack E. Rawlinson, Special Needs Consultant, Crossville, Illinois; and Leonard Slominski, Dean of Instruction, Lakeland Community College, Mentor, Ohio.

Acknowledgement is given to the official reviewers who provided critiques of the module and suggestions for its improvement: James W. Lunsford, Support Services Coordinator, Division of Vocational Education, State Department of Public Instruction, Raleigh, North Carolina; Carl Proehl, Chairman and Professor, Technical and Vocational Studies, The University of West Florida, Pensacola, Florida; and Howard Sidney, Dean of Academic Affairs, SUNY Agricultural and Technical College, Cobleskill, New York.

Credit goes to Lois G. Harrington, Program Associate, who helped to refine the module for publication after field testing; and to Robert E. Norton, Consortium Program Director, for providing program leadership and content reviews. Thanks go to Ferman B. Moody, Associate Director for Personnel Development, for his administrative assistance.

Appreciation is also extended to Calvin Cotrell, Carroll Curtis, James Haire, George Kosbab, Helen Lipscomb, Aaron J. Miller, Dominic Mohamed, Robert Mullen, James Parker, Dale Post, and Wayne Ramp for their service as state representatives, state department contacts, and field-test coordinators; and to the other teacher educators and local administrators of vocational education who used the modules and provided valuable feedback and suggestions for their improvement. Last, but certainly not least, thanks and credit are due Deborah Linehan, Consortium Program Secretary, for her patience and expert skill in processing the many words necessary to make this module a quality document.

Robert E. Taylor
Executive Director
The National Center for Research
in Vocational Education

INTRODUCTION

Vocational-technical institutions enjoy a great deal of autonomy. Members of the faculty and staff of these institutions may perceive that the actions of their local administrators--requiring faculty and staff to submit reports, adding new programs, or imposing regulations to cover any conceivable situation--are likewise initiated on the sole authority of the administration.

Such is seldom the case. In fact, any type of educational institution, because it is a public agency (or a private one serving a public purpose), must (1) ensure that its practices conform to applicable laws, (2) integrate its activities within a larger scheme of public services, and (3) subordinate its mission to that of one or several other governmental agencies. It also behooves local administrators to coordinate their plans and operations with those of other individuals in charge of related organizations within the same geographical area in order to ensure that all needed, feasible services are being provided without inefficient duplication.

Thus, cooperating with governmental and community agencies is an important competency for an administrator to develop. In this module you will learn how to accomplish crucial tasks such as complying with and influencing legislation and regulations, developing comprehensive plans, and submitting required reports. You will also learn techniques for fostering the several types of cooperative arrangements--ranging from formal contracts to informal visits--that assure mutually supporting efforts among related organizations.

By mastering this competency, you should also become aware of some of the factors and forces that constrain your actions. Moreover, you should acquire new confidence in your ability to use the dynamics of cooperative action to influence other agencies, administrators, and officials to change their means of operation in ways that will help your institution to better accomplish its mission.

Module Structure and Use

This module contains an introduction and four sequential learning experiences. Overviews, which precede each learning experience, contain the objective for each experience and a brief description of what the learning experience involves.

Objectives

Terminal Objective: While working in an actual administrative situation, cooperate with governmental and community agencies. Your performance will be assessed by your resource person, using the "Administrator Performance Assessment Form," pp. 83-85.

Enabling Objectives:

1. After completing the required reading, write a letter to an appropriate official to comment on a pending law, plan, or rule/regulation. (Learning Experience I)
2. After completing the required reading, critique the performance of an administrator in a given case study in preparing and submitting required reports. (Learning Experience II)
3. After completing the required reading, critique the performance of an administrator in a given case study in preparing a cooperative agreement with a local agency. (Learning Experience III)

Resources

A list of the outside resources that supplement those contained within the module follows. Check with your resource person (1) to determine the availability and the location of these resources, (2) to locate additional references specific to your situation, and (3) to get assistance in setting up activities with peers or observations of skilled administrators.

Learning Experience I

Optional

- A SESSION OF A FEDERAL/STATE LEGISLATIVE HOUSE OR A COMMITTEE HEARING that you can attend.
- A GROUP OF PEERS with whom you can form a mock legislative body and to whom you can present testimony.

- AN OFFICIAL AT THE FEDERAL OR STATE LEVEL responsible for preparing plans, rules, or regulations whom you can interview.
- A MEETING OF A COMMUNITY GROUP, such as a chamber of commerce, CETA planning board, or labor union, that you can attend.

Required

- A RESOURCE PERSON to assess your competency in writing a letter to an appropriate official.

Learning Experience II

Optional

- AN OFFICIAL OF A STATE, LOCAL, OR EDUCATIONAL AGENCY responsible for preparing reports frequently whom you can interview.
- A SET OF INSTRUCTIONS FOR ONE OR MORE FREQUENTLY PREPARED REPORTS that you can examine.

Learning Experience III

Optional

- COPIES OF COOPERATIVE AGREEMENTS BETWEEN EDUCATIONAL AND OTHER INSTITUTIONS that you can examine and compare.
- REFERENCE: Abbott, William L. "The Mansfield Formula for Worker Renewal." VocEd (Journal of the American Vocational Association). 54 (May 1979): 38-41.
- REFERENCE: Dennis, William H. "Class at the Plant." VocEd (Journal of the American Vocational Association). 53 (September 1978): 40-42.
- REFERENCE: Lancaster, Stewart V., and Shuford, David F. "Employers and Educators Team Up in Tucson." Community and Junior College Journal. 50 (May 1980): 35-37.
- REFERENCE: McGough, Robert L., and Manley, Katherine K. "Linkages Can Work." VocEd (Journal of the American Vocational Association). 56 (January/February 1981): 63-66.
- REFERENCE: Moed, Martin G. "College with Its Own High School." Community and Junior College Journal. 52 (September 1981): 21-23.

- REFERENCE: Stahl, Ben. "Increasing Union Participation." VocEd (Journal of the American Vocational Association). 55 (October 1980): 42-45.
- REFERENCE: Wireenski, Jerry L. "Vocational Education and CETA Cooperate to Solve Local Manpower Problem." VocEd (Journal of the American Vocational Association). 43 (May 1978): 60-64.

Learning Experience IV

Required

- AN ACTUAL ADMINISTRATIVE SITUATION in which, as part of your duties, you can cooperate with governmental and community agencies.
- A RESOURCE PERSON to assess your competency in cooperating with governmental and community agencies.

Selected Terms

Administrator--refers to a member of the secondary or postsecondary administrative team. This generic term, except where otherwise specified, refers to the community college president, vice-president, dean, or director; or to the secondary school principal, director, or superintendent.

Board--refers to the secondary or postsecondary educational governing body. Except where otherwise specified, the term "board" is used to refer to a board of education and/or a board of trustees.

Institution--refers to a secondary or postsecondary educational agency. Except where otherwise specified, this generic term is used to refer synonymously to secondary schools, secondary vocational schools, area vocational schools, community colleges, postsecondary vocational and technical schools, and trade schools.

Resource Person--refers to the professional educator who is directly responsible for guiding and helping you plan and carry out your professional development program.

Teacher/Instructor--these terms are used interchangeably to refer to the person who is teaching or instructing students in a secondary or postsecondary educational institution.

User's Guide

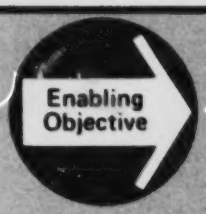
For information that is common to all modules, such as procedures for module use, organization of modules, and definitions of terms, you should refer to the following supporting document:

> Guide to Using Competency-Based Vocational Education Administrator Materials. Columbus, OH: The Center for Vocational Education, The Ohio State University, 1977.

This module addresses task statement numbers 92-94, 98, 99, 112, and 166 from Robert E. Norton et al., The Identification and National Verification of Competencies Important to Secondary and Post-Secondary Administrators of Vocational Education (Columbus, OH: The Center for Vocational Education, The Ohio State University, 1977). The 166 task statements in this document, which were verified as important, form the research base for the National Center's competency-based administrator module development.

Learning Experience I

OVERVIEW



After completing the required reading, write a letter to an appropriate official to comment on a pending law, plan, or rule/regulation.

You will be reading the information sheet, "Developing Laws, Rules/Regulations, and Plans," pp. 9-35.

You may wish to visit a session of the entire house of a federal/state legislature or a hearing of one of the legislative committees, in order to observe firsthand how laws are drafted, changed, and enacted.

You and a group of peers may wish to form a mock legislative committee and take turns presenting and discussing testimony concerning pending legislation.

You may wish to learn more about the planning or rule-making process by visiting an official at the federal or state level.

continued

You may wish to attend a meeting of a community group (e.g., the chamber of commerce, a CETA advisory committee, or labor union) to observe what public issues they are concerned with and how they organize to affect these issues.

You will be writing a letter to an appropriate official to comment on a pending law, plan, or rule/regulation.

Your competency in writing a letter to an appropriate official to comment on a pending law, plan, or rule/regulation will be evaluated by your resource person, using the "Letter Writing Checklist," pp. 39-40.

Activity

For information about how laws, rules/regulations, and plans are drafted and enacted, read the following information sheet.

DEVELOPING LAWS, RULES/REGULATIONS, AND PLANS

Educational institutions perform a function that is notably public. That is, the benefits of education apply not only to the individual who receives them but also to the society at large. This includes the employers who require trained workers (e.g., business executives, cooks, machinists, painters, physicians, pilots, salespersons) to produce goods and services. It also includes the consumers who need those goods and services. And it includes the families of the workers who are supported by the income they earn.

Since society has a broad and direct interest in the outcomes of education, it is proper that society have some role in directing the form, mission, activities, and roles of educational institutions. The primary means by which society expresses its collective will concerning the performance of actions in the public interest is through law and policy. Specifically, law and policy are formally set forth in three forms: law (per se), rules and regulations, and formal plans.

Laws are created predominantly through enactment by a legislative body (e.g., the U.S. Congress, a state legislature, or a city council) and are known as statutory law. Less often, law is created by judicial precedent and jurisprudence (common law) or by the drafting or revision of a constitution or charter (constitutional law).

Rules and regulations can be thought of as administrative law. An important distinction is that rules and regulations are created by administrators or bureaucrats (in the proper, not the derogatory, sense of the word--i.e., one who works in a bureau), within the limits set by one of the three formal types of laws. That is, an act of Congress or the verdict of a judge becomes the authority for and basis of rules and regulations. The role of rules and regulations, in turn, is to provide specific guidance for implementing the spirit and intent of a law. The law is the frame; the rules and regulations are the details of the picture within that frame.

Plans are generally prepared by appointed commissions, often with the assistance of advisory committees made up of the general citizenry. The commission may itself have the power to establish the plan, or it may have to submit a draft plan to a formal body or an elected official for enactment. In nearly every case, development of a plan is required by law or by a rule or regulation as a prerequisite for the transfer of funds from a higher level of government to a lower level. Examples of planning subject areas include zoning and land use, economic development, transportation, and of course, vocational education.

Because these three principal instruments of public policy--laws, rules/regulations, and plans--are developed in such different ways, it will be helpful to describe each of them separately before discussing common means by which you as an administrator can "cooperate"--both by complying with them or helping to develop them.

Laws and Legislation

Since most laws relating to education are statutory law--that is, enacted through the legislative process--it is important that you understand that process thoroughly. The procedures described in the next few pages relate primarily to the U.S. Congress, but they also apply to nearly all the state legislatures as well (with some modifications for Nebraska, which has a unicameral, or one-house, system.)

Usual Procedure

In its simplest form, the flow of a law (or a bill, as it is known while it is pending), from introduction through enactment, is very similar to that of a motion in a club meeting where parliamentary procedure is followed (see sample 1). The bill is first introduced by a sponsor, and then it is referred to one of several standing (permanent) committees composed of several members of the body.

After that committee considers the bill, it decides whether to recommend its approval to the entire assembly (house). Before the entire body, the bill is subjected to further debate and/or amendment and is finally approved or rejected by a majority vote of all legislators present. At this point, the bill becomes an act and is made official by the signature of the chief executive (President, governor, or mayor).

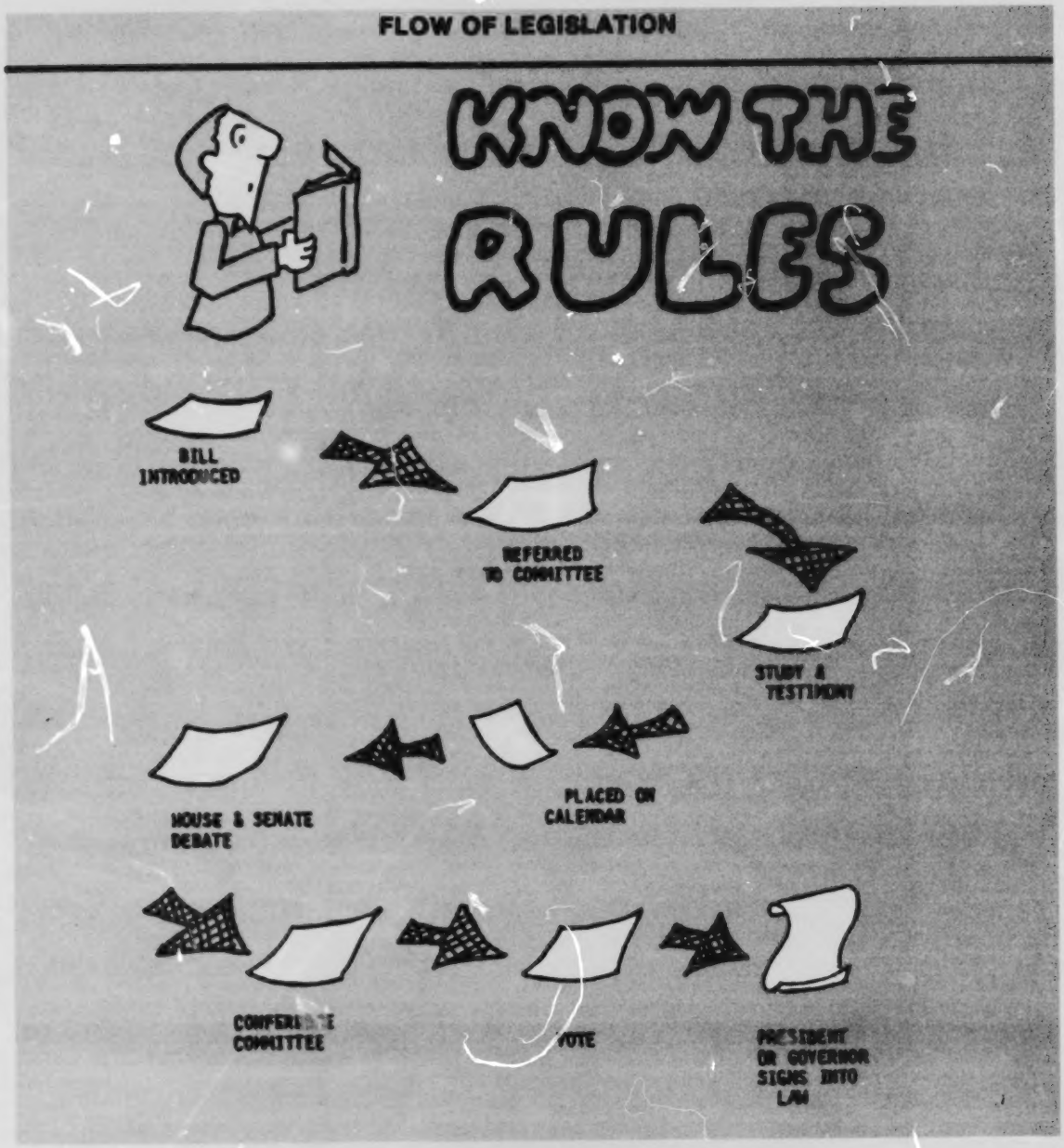
Complex Procedures

In actual practice, of course, the process is a great deal more complex than this, involving many more participants and a great deal more time.

The first complication is that two houses (chambers)--the House of Representatives and the Senate--must both act on the bill before it becomes law. This requires either (1) that one chamber await the other's final action on a bill before it can consider it (consuming time) or (2) that an identical or very similar companion bill be introduced in the other chamber, with parallel debate and hearings. This latter course often results in widely differing versions of the same bill. In either case, if one chamber passes a bill in any form that is not exactly like the form in which the other chamber adopted it, a conference committee must be formed to draft a compromise version. The acceptance of the conference committee report by a majority vote in each chamber is then required for enactment.

SAMPLE 1

FLOW OF LEGISLATION



The second complication relates to the various sources from which a bill can originate. For example, the U.S. House of Representatives is the only chamber wherein bills related to finance (taxes and appropriations) may be introduced. In reality, however, the administration (executive branch) devises annual budgets; it also drafts the substance of most proposals relating to major governmental programs. Cabinet officers or the President then must persuade a loyal and agreeable member of the House (usually one from their own party) to introduce the legislation. In many cases, a group of representatives might be willing to serve as cosponsors (authors) for a bill. In fact, it is not unusual for a bill to ultimately acquire 40-50 authors.

In still other cases, two or three representatives or senators might collaborate to draft a bill that represents the best of their respective thinking about a particular subject and that attracts the support of the sometimes different constituencies or support groups of each congressional member. It is from such alliances that many laws have derived their common names, such as the Smith-Hughes Act or the Taft-Hartley Act. (Actually, private citizens and groups such as professional associations or labor unions often assist legislators in drafting bills too.)

A third complication often occurs when the President decides to oppose a bill that has been passed by both chambers of Congress. This opposition can be expressed passively; the President can simply refuse to sign the bill. After ten days, if Congress is still in session, the bill becomes law anyway. If Congress has already adjourned, the President can pocket veto the bill by declining to sign it, and it dies. Alternatively, the President can actively veto the bill. A two-thirds vote, rather than a simple majority, of both chambers is then required to override the veto.

Naming and Numbering of Laws

Before tracing an actual law through this process, we should say a few words about the names commonly applied to laws and the numbering system used for even more accurate reference. Knowing the full, correct nomenclature of a law can help you research its history or aid you when you discuss it with colleagues or legislators.

You have already seen that the names of the authors of a bill often are permanently associated with them (e.g., Smith-Hughes Act, Morrill Land Grant Act). In other cases, the laws acquire a descriptive name, such as the Elementary and Secondary Education Act of 1965, briefly stated as ESEA. Subsequent amendments to this bill then become known as the Amendments of 19--. ESEA was amended in major ways in 1970, 1974, and 1978. The Higher Education Act of 1965 was amended in 1972, 1974, 1976, and 1980. Finally, the Vocational Education Act (VEA) of 1963 was amended in 1968 and was affected by the 1974 Education Amendments.

Because laws of this nature have a broad scope, they are subdivided into numbered titles. Educators are fond of name-dropping--referring to a program, requirement, or provision by its title number. Beware of this inaccurate

practice. Title I to an elementary teacher probably means a reading program--in this case, one authorized by Title I of ESEA. However, to an adult education administrator, Title I might mean a grant program to support continuing education and community service programs, as authorized by Title I of the Higher Education Act of 1965. The same confusion is possible with the various titles/programs of such legislation as the Comprehensive Employment and Training Act (CETA) and, of course, the Vocational Education Act and its several amendments.

Citing section numbers likewise is a popular way to refer to laws, but it is equally imprecise. For example, do you know which law Section 504 is a part of? (It's the 1973 Rehabilitation Act.)

In most cases, the short working name for a law is stipulated within the bill itself or in marginal notes of the U.S. Code or other statute reference books.

By far the most accurate way to refer to a law, however, is by its number. During legislative consideration, a law-in-the-making is a bill and bears either an S or an H number, for Senate and House bill respectively. (The numbers are assigned in order of introduction and may rise as high as 20,000 near the end of a busy two-year session.) Once enacted, a bill becomes an act and is numbered with both the number of the congressional session and a sequential number, preceded by P.L. for Public Law. Thus, P.L. 94-35 would have been enacted early in the 94th Congress (1975-76).

The Case History of a Law

Now let's illustrate the legislative process by looking at the history of a typical law--one that has affected education within the last decade. The example chosen is commonly referred to as the Buckley Amendment. It established the right of a student and his/her parents to examine the contents of his/her academic records. As we proceed, you will see how this name evolved and will learn the full, correct name of the law.

Introduction. On April 11, 1973, Senator Claiborne Pell (D., R.I.) introduced Senate Bill 1539, which was also to be known as the Elementary and Secondary Education Amendments of 1973. This bill was dozens of pages long. Some of it contained routine housekeeping phrases (updating changes to the original ESEA of 1965). Other portions contained substantive changes in doctrine or authorized new funds and programs (see excerpts, sample 2). The bill was promptly referred to the Senate's Committee on Labor and Public Welfare.

Companion bill. Similar action had already been undertaken in the House on H. 69, a companion bill introduced by Representative John Brademas (D., Ind.) and 13 of his colleagues on January 3, 1973.

Committee hearings. The committees in both chambers held extensive hearings on the bill--receiving testimony from the administration (primarily officials of the Office of Education in the Department of Health, Education

SAMPLE 2

A BILL

S. 1539

IN THE SENATE OF THE UNITED STATES

APRIL 11, 1973

Mr. PELL introduced the following bill; which was read twice and referred to the Committee on Labor and Public Welfare

A BILL

To amend and extend certain Acts relating to elementary and secondary education programs, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "Elementary and Secondary Education Amendments of 1973".

II

TITLE I—AMENDMENTS TO THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965

PART A—SPECIAL PROGRAMS TO MEET THE SPECIAL EDUCATIONAL NEEDS OF EDUCATIONALLY DEPRIVED CHILDREN

DURATION OF PROGRAMS

SEC. 101. (a) Section 102 of title I of the Elementary and Secondary Education Act is amended by striking out "June 30, 1973" and inserting in lieu thereof "June 30, 1977".

(b) The third sentence of section 103(a)(1)(A) of such title I is amended by striking out "July 1, 1973" and inserting in lieu thereof "July 1, 1977".

(c) Paragraph (3) of section 103(a) of such title I is amended by striking out "(B)" at the beginning of subparagraph (B) and by striking out subparagraph (A) thereof.

(d) Subsection (c) of section 103 of such title I is amended by striking out "$2,000" and all that follows, and inserting in lieu thereof the following: ", subject to section 144, for any fiscal year 50 per centum and $4,000, respectively.".

and Welfare), spokespersons of the many national associations involved with education, and a few private citizens. (Records of these hearings, including verbatim accounts of testimony and copies of all exhibits, are available from the U.S. Government Printing Office and are retained in major libraries around the country.)

Committee action. The committees then held their own closed meetings, finally reporting the marked-up bills to their respective chambers the following year. S. 1539 was reported to the Senate on March 29, 1974.

Senate action. Debate began later that spring, and on May 14, Senator James Buckley (Conservative-N.Y.) and 11 others introduced a lengthy amendment during floor consideration. The amendment was soon adopted, and the entire bill, now known as the Education Amendments of 1974, passed the Senate on May 20.

Conference committee action. Since S. 1589 now differed in many ways from the House version, passed there on March 27, a conference committee was convened. The report of the conference committee was accepted by the Senate on July 31 and by the House on July 24, and the bill became law when signed by President Ford on August 21, 1974.

Nomenclature and reference. At this point, the law became P.L. 93-380. For ease of reference, the law is recorded in two lawbooks, as follows:

> The law is entered into the U.S. Code, which is organized by subject. (An omnibus law, one covering varied topics, might have its parts show up in scattered locations.) In its correct location, the Buckley Amendment became 20 USC 1232g.
>
> U.S. Statutes at Large contains all laws passed, in their entirety, shown in chronological order (see excerpts, sample 3). In this case, P.L. 93-380 is in volume 88 (one volume for each Congress), pages 571-574. (The shorthand citation is 88 Stat. 571-4.) Notice that the part we are interested in was Section 513 of the 1974 Amendments, modifying Section 438 of the original ESEA. The marginal note confers the official name of Family Educational Rights and Privacy Act of 1974 on only this portion of the 1974 amendments.

It's little wonder that we use convenient names in lieu of the official pedigree. Just be careful to use the appropriate reference (either a bill number or the P.L. number) when researching a law or when preparing to communicate with a legislator.

By the way, notice in the very first lines of the amendment (the portion circled in sample 3) that this law applies not only to elementary and secondary schools (as we would expect for amendments to ESEA) but also to institutions of higher education and to other educational agencies.

SAMPLE 3

AN ACT AS SHOWN IN STATUTE BOOKS

PROTECTION OF THE RIGHTS AND PRIVACY OF PARENTS AND STUDENTS

SEC. 513. (a) Part C of the General Education Provisions Act is further amended by adding at the end thereof the following new section:

Family Educational Rights and Privacy Act of 1974.

"PROTECTION OF THE RIGHTS AND PRIVACY OF PARENTS AND STUDENTS

20 USC 1232g.

"SEC. 438. (a)(1) No funds shall be made available under any applicable program to any State or local educational agency, any institution of higher education, any community college, any school, agency

offering a preschool program, or any other educational institution which has a policy of denying, or which effectively prevents, the parents of students attending any school of such agency, or attending such institution of higher education, community college, school, preschool, or other educational institution, the right to inspect and review any and all official records, files, and data directly related to their children, including all material that is incorporated into each student's cumulative record folder, and intended for school use or to be available to parties outside the school or school system, and specifically including, but not necessarily limited to, identifying data, academic work completed, level of achievement (grades, standardized achievement test scores), attendance data, scores on standardized intelligence, aptitude, and psychological tests, interest inventory results, health data, family background information, teacher or counselor ratings and observations, and verified reports of serious or recurrent behavior patterns. Where such records or data include information on more than one student, the parents of any student shall be entitled to receive, or be informed of, that part of such record or data as pertains to their child. Each recipient shall establish appropriate procedures for the granting of a request by parents for access to their child's school records within a reasonable period of time, but in no case more than forty-five days after the request has been made.

Hearing.

"(2) Parents shall have an opportunity for a hearing to challenge the content of their child's school records, to insure that the records are not inaccurate, misleading, or otherwise in violation of the privacy or other rights of students, and to provide an opportunity for the correction or deletion of any such inaccurate, misleading, or otherwise inappropriate data contained therein.

Release of records, parental consent requirement.

"(b)(1) No funds shall be made available under any applicable program to any State or local educational agency, any institution of higher education, any community college, any school, agency offering a preschool program, or any other educational institution which has a policy of permitting the release of personally identifiable records or files (or personal information contained therein) of students without the written consent of their parents to any individual, agency, or organization, other than to the following—

"(A) other school officials, including [illegible] educational institution or local educational [illegible] legitimate educational interests;

"(B) officials of other [illegible] student intends to enroll, [illegible] ents be notified of [illegible] desired, and [illegible] cont[illegible]

"(A) there is written consent from the student's parents specifying records to be released, the reasons for such release, and to whom, and with a copy of the records to be released to the student's parents and the student if desired by the parents, or

"(B) such information is furnished in compliance with judicial order, or pursuant to any lawfully issued subpoena, upon condition that parents and the students are notified of all such orders or subpoenas in advance of the compliance therewith by the educational institution or agency.

Records, accessibility for audit.

"(3) Nothing contained in this section shall preclude authorized representatives of (A) the Comptroller General of the United States, (B) the Secretary, (C) an administrative head of an education agency or (D) State educational authorities from having access to student or other records which may be necessary in connection with the audit and evaluation of Federally-supported education program, or in connection with the enforcement of the Federal legal requirements which relate to such programs: *Provided*, That, except when collection of personally identifiable data is specifically authorized by Federal law, any data collected by such officials with respect to individual students shall not include information (including social security numbers) which would permit the personal identification of such students or their parents after the data so obtained has been collected.

Written request.

"(4)(A) With respect to subsections (c)(1) and (c)(2) and (c)(3), all persons, agencies, or organizations desiring access to the records of a student shall be required to sign a written form which shall be kept permanently with the file of the student, but only for inspection by the parents or student, indicating specifically the legitimate educational or other interest that each person, agency, or organization has in seeking this information. Such form shall be available to parents and to the school official responsible for record maintenance as a means of auditing the operation of the system.

"(B) With respect to this subsection, personal information shall only be transferred to a third party on the condition that such party will not permit any other party to have access to such information without the written consent of the parents of the student.

Surveys.

"(c) The Secretary shall adopt appropriate regulations to protect the rights of privacy of students and their families in connection with any surveys or data-gathering activities conducted, assisted, or authorized by the Secretary or an administrative head of an education agency. Regulations established under this subsection shall include provisions controlling the use, dissemination, and protection of such data. No survey or data-gathering activities shall be conducted by the Secretary, or an administrative head of an education agency under an applicable program, unless such activities are authorized by law

"(d) For the purposes of this section, whenever a student has attained eighteen years of age, or is attending an institution of postsecondary education the permission or consent required of and rights accorded to the parents of the student shall thereafter be required of and accorded to the

"(e) No funds shall be made available under any applicable program unless

dents.

be taken only if the Secretary finds there has been a failure to comply with the provisions of this section, and he has determined that compliance can not be secured by voluntary means.

"(g) The Secretary shall establish or designate an office and review board within the Department of Health, Education, and Welfare for the purpose of investigating, processing, reviewing, and adjudicating violations of the provisions of this section and complaints which may be filed concerning alleged violations of this section, according to the procedures contained in sections 434 and 437 of this Act.".

Ante, pp. 568-571.

Effective date. 20 USC 1232g note.

(b)(1)(i) The provisions of this section shall become effective ninety days after the date of enactment of section 438 of the General Education Provisions Act.

20 USC 1232g note.

(2)(i) This section may be cited as the "Family Educational Rights and Privacy Act of 1974".

Rules and Regulations

In spite of their apparent complexity, the laws enacted by legislative bodies seldom are specific enough to apply to all contingencies, nor do they describe in detail how a law is to be enforced or how a new program is to be implemented. Because the legislative process is issue-oriented and relatively time-consuming, Congress has chosen to limit its efforts to the determination of broad policy and doctrinal matters. It leaves to the executive branch (i.e., the administration, including Cabinet departments, bureaus, commissions, and so on) the task of drafting the necessary volumes of detailed rules and regulations.

The key document in which all rules and regulations can be found is the Code of Federal Regulations (CFR). The CFR is to administrative rule making what the U.S. Code is to legislative action--a document that is constantly being amended but that contains information in easily located categories, much as a library contains books cataloged by the Dewey Decimal System or a similar scheme in order to help patrons locate books.

Currently, Title 34 (a self-contained volume) of the CFR is the location of most rules pertaining to education, and it is affected primarily by the rule-making actions of the U.S. Department of Education (ED). If we were to look up Part 99 of this title, we would find the passages shown in sample 4--the familiar subject of students' and parents' rights of access to educational records. The fine print reveals, in this case, that these rules are authorized by or founded on the same passage of the U.S. Code (20 USC 1232g) that was altered by the 1974 amendments to the 1965 ESEA: the now-familiar Buckley Amendment.

In other words, sample 4 is an example of rules and regulations that contain verbatim portions of a law that was fairly specific and that required, or allowed, little elaboration.

Notice of Proposed Rule Making

In other cases, Congress is not so confining. In fact, some laws may state only that "The Secretary of Education is empowered to promulgate regulations to establish a program to accomplish X-Y-Z . . ." or "Eligibilty for grants under this title shall be determined by the Secretary using such criteria as he/she shall establish by appropriate means . . . ."

When rules or regulations are established with this degree of administrative discretion or initiative, a great deal of public participation is sought. The principal vehicle for informing citizens about possible changes to rules is the Federal Register. This document is published every business day of the year by the U.S. Government Printing Office. Individuals or organizations may subscribe to it or can find copies in most libraries.

In effect, the Federal Register reports only those parts of the federal rules that are undergoing change. The CFR is a record of the entire set of

SAMPLE 4

RULES AS SHOWN IN *CODE OF FEDERAL REGULATIONS (CFR)*

PART 99—PRIVACY RIGHTS OF PARENTS AND STUDENTS

Subpart A—General

Sec.
99.1 Applicability of part.
99.2 Purpose.
99.3 Definitions.
99.4 Student rights.
99.5 Formulation of institutional policy and procedures.
99.6 Annual notification of rights.
99.7 Limitations on waivers.
99.8 Fees.

Subpart B—Inspection and Review of Education Records

Sec.
99.11 Right to inspect and review education records.
99.12 Limitations on right to inspect and review education records at the postsecondary level.
99.13 Limitation on destruction of education records.

Subpart C—Amendment of Education Records

99.20 Request to amend education records.
99.21 Right to a hearing.
99.22 Conduct of the hearing.

Subpart D—Disclosure of Personally Identifiable Information From Education Records

99.30 Prior consent for disclosure required.
99.31 Prior consent for disclosure not required.
99.32 Record of requests and disclosures required to be maintained.
99.33 Limitation on redisclosure.
99.34 Conditions for disclosure to officials of other schools and school systems.
99.35 Disclosure to certain Federal and State officials for Federal program purposes.
99.36 Conditions for disclosure in health and safety emergencies.
99.37 Conditions for disclosure of directory information.

Subpart E—Enforcement

99.60 Office and review board.
99.61 Conflict with State or local law.
99.62 Reports and records.
99.63 Complaint procedure.
99.64 Termination of funding.
99.65 Hearing procedures.
99.66 Hearing before Panel or a Hearing Officer.
99.67 Initial decision; final decision.

AUTHORITY: Sec. 438, Pub. L. 90-247, Title IV, as amended, 88 Stat. 571-574 (20 U.S.C. 1232g), unless otherwise noted.

SOURCE: 45 FR 30811, May 9, 1980, unless otherwise noted.

Subpart A—General

§ 99.1 Applicability of part.

(a) This part applies to all educational agencies or institutions to which funds are made available under any Federal program for which the Secretary of the U.S. Department of Education has administrative responsibility, as specified by law or by delegation of authority pursuant to law.

(20 U.S.C. 1230, 1232g)

(b) This part does not apply to an educational agency or institution solely because students attending that non-monetary agency or institution receive benefits under one or more of the Federal programs referenced in paragraph (a) of this section, if no funds under those programs are made available to the agency or institution itself.

(c) For the purposes of this part, funds will be considered to have been made available to an agency or institution when funds under one or more of the programs referenced in paragraph (a) of this section: (1) Are provided to the agency or institution by grant, contract, subgrant, or subcontract, or (2) are provided to students attending the agency or institution and the funds may be paid to the agency or institution by those students for educational purposes, such as under the Basic Educational Opportunity Grants Program and the Guaranteed Student Loan Program (Titles IV-A-1 and IV-B, respectively, of the Higher Education Act of 1965, as amended).

(20 U.S.C. 1232g)

(d) Except as otherwise specifically provided, this part applies to education records of students who are or have been in attendance at the educational agency or institution which maintains the records.

(20 U.S.C. 1232g)

§ 99.2 Purpose.

The purpose of this part is to set forth requirements governing the protection of privacy of parents and students under section 438 of the General Education Provisions Act, as amended.

(20 U.S.C. 1232g)

§ 99.3 Definitions.

As used in this part:

"Act" means the General Education Provisions Act, Title IV of Pub. L. 90-247 as amended.

federal rules that are in effect at a given time. Using the library analogy, you can think of the CFR as a card catalog listing the library's total holdings, whereas the Federal Register is similar to a circular that lists the library's new acquisitions.

As soon as the bureaucrats have drafted a tentative set of rules and regulations, they must announce them in the Federal Register as a Notice of Proposed Rule Making (NPRM). If you look at sample 5, p. 22, you will see an example of an NPRM, in this case referring to the Veterans' Cost-of-Instruction Program. Early portions of an NPRM contain a summary of the significant changes effected by the new rules, state how comments can be submitted, announce a deadline for these comments, and cite the authority under which the rules will be issued. The latter portion of the NPRM then quotes the affected parts of the CFR (in this case, Title 34, Part 629) as they will appear if the proposed rules are approved as drafted.

After the deadline for submitting comments has passed (usually 90 days after the NPRM is published), officials within the proponent agency consider that all the comments have been received and make whatever changes they deem appropriate. At this point, they issue the regulations in final form, again via the Federal Register (see sample 6, p. 23).

By comparing sample 6 with sample 5, you can see that the latter portions of each have the same form, if not exactly the same content. However, the regulations shown in sample 6 are designated as final regulations and will take effect within only 45 days--unless serious objections are interposed by congressional action. That is, the "speak-now-or-forever-hold-your-peace" period has substantially passed, and the administration is now informing the public that new rules will soon be in force.

To reveal the administrators' rationale for these final regulations, the Federal Register announcement includes a summary of the comments received, the agency's analysis of those comments, and a description of whatever action was taken. These responses range from "No change is made in the regulations" (circled portion A) to "The phrase . . . has been added" or "The reference to . . . has been deleted" (circled portions B and C), or they include at least an explanation of how certain phrases will be interpreted (circled portion D).

Rule Making at Other Levels of Government

Rules and regulations can also be generated at the state, regional, or local levels of government. In general, state agencies follow the same general procedure of notification-comment-final rule making, but their system for publishing these rules might not be as elaborate--perhaps they may issue an infrequently published circular or a newsletter only as required.

County and municipal government offices and local education agencies will likely use even simpler means for communicating the intent or details of new rules. For example, the city traffic commissioner might rely on newpaper accounts of his/her report to city council in order to notify the public of

new parking rules. Likewise, a vocational administrator might announce in a faculty/staff meeting that purchasing or personnel procedures are under revision and then invite volunteers to serve on a committee for that purpose.

In each case, the persons affected still have a right to expect that the final rules and regulations eventually will appear in a written form available for public review, preferably in a codified, indexed document. Examples of these are (1) the teacher/administrator certification standards often published as an annual handbook by state departments of education, (2) the personnel policies manual prepared by an assistant superintendent of a school district, or (3) the grading and admissions rules printed in a technical college catalog.

Plans

Everyone makes plans, albeit sometimes in very informal ways. Individuals, or key persons within educational institutions, often viewed the process of planning as a means to an end. This process was not always expected to produce any formal document, other than perhaps a budget. However, legislative action and administrative rules now require the development of elaborate, formal, written plans at local, regional, and state levels. Let us look at some examples.

- Vocational education laws--The 1976 Education Amendments (P.L. 94-482) placed particular emphasis on both planning and evaluation. Specifically, the law requires that each state, in order to become eligible for federal funding of any type, must prepare and submit both an annual plan and a five-year plan.

  These plans must first be reviewed and approved by a statewide vocational-technical education advisory committee and by the state board of education. In turn, each local educational agency (LEA)--that is, a local, city, county, or joint school district--must prepare its own annual and five-year plans if it, too, desires to receive funds from the federal government--even if those funds are routed through a state education agency (SEA).

  As you might expect, the LEA plan must be consistent with that of the SEA. Thus, most state departments of education have organized a division whose staff members must review LEA plans and provide technical assistance to help LEAs comply with this requirement.

- Special education laws--The Education for All Handicapped Children Act (P.L. 94-142) authorized the granting of federal funds to assist states in providing free public education to all handicapped persons from ages 3 to 21. Just as in the case of the Vocational Education Act (VEA) of 1963, states become eligible by preparing and submitting an annual program plan to the U.S. Department of Education.

  In turn, any LEA seeking to receive funds under the provisions of this act must submit a local comprehensive plan for special education to

SAMPLE 5

NOTICE OF PROPOSED RULEMAKING (NPRM) IN THE *FEDERAL REGISTER*

34 CFR Part 629

Veterans' Cost-of-Instruction Payments Program

AGENCY: Department of Education.

ACTION: Notice of Proposed Rulemaking

SUMMARY: The Secretary proposes to amend the regulations for the Veterans' Cost-of-Instruction Payments (VCIP) Program. The regulations are being amended to reflect the statutory changes in the Education Amendments of 1980 and to reflect several administrative policy decisions. The proposed changes affect the eligibility criteria, the requirements of each grantee, and the payment process. The regulations have also been completely reorganized for the purposes of simplification and clarification.

DATES: Comments must be received on or before March 2, 1981.

ADDRESSES: Comments should be addressed to Stanley B. Patterson, Office of Postsecondary Education, Office of Institutional Support, U.S. Department of Education (Room 3514, ROB–3), 400 Maryland Avenue, S.W., Washington, D.C. 20202.

FOR FURTHER INFORMATION CONTACT: Stanley B. Patterson. Telephone: (202) 245–2808.

SUPPLEMENTARY INFORMATION: The Veterans' Cost-of-Instruction Payments Program began in 1973 as a formula grant program which assists institutions of higher education in the provision of educational services to veterans. Grants support full-time offices of veterans' affairs which provide outreach, recruitment, counseling and tutorial services, and special programs for *educationally disadvantaged veterans*.

The proposed text of the revised regulations governing the VCIP program is printed following this preamble. The proposed changes in the regulations reflect the following administrative policy decisions:

(1) An amendment is proposed in Section 629.31(d) to give institutions their entire grant in one payment at the beginning of the academic year. The amount of the payment would be based on veteran enrollment on April 16. This single-payment system would replace the three-payment system now in use. This new system would ease the reporting requirements of grantees and enable an institution to plan its program activities more effectively.

(2) An amendment is proposed to delete as unnecessary the section entitled, Criteria for assessing the adequacy of veterans' programs, presently found in 34 CFR Section 629.16. Many of these criteria are already covered in Section 629.11 of the proposed regulations.

(3) An amendment is proposed to modify the definitions of "institution of higher education", "student", and "undergraduate" to bring the VCIP regulations into conformity with standard Education Department definitions.

The current regulations are also being amended to reflect the statutory changes in the Education Amendments of 1980. These revisions include:

(1) The eligibility criteria are amended so that a renewal applicant will no longer be eligible if it merely maintains its undergraduate veteran enrollment. It will be eligible, however, if its veteran enrollment increases by 10 percent, or if it meets the requirements of one of the other methods by which a renewal applicant can establish eligibility.

(2) An institution accepting a grant must now make an adequate effort to carry out outreach activities with a special emphasis on service-connected disabled veterans, other disabled or handicapped veterans, and incarcerated veterans in addition to educationally disadvantaged veterans.

(3) Institutions are required to make an adequate effort to coordinate their activities with the readjustment counseling program authorized under section 620 of title 38, and with the veterans employment and training initiatives authorized under the Comprehensive Employment and Training Act and under chapters 41 and 42 of title 38, in order to assist in serving the readjustment, rehabilitation, personal counseling and employment needs of veterans.

(4) The enrollment ceiling of 2500 undergraduate students below which an institution can enter a consortium arrangement is deleted. This deletion does not pertain to the ceiling of 2500 undergraduate students below which an institution need only maintain a full-time office of veterans's affairs and provide recruitment and counseling services.

(5) The second category of veterans for which an institution will receive a payment is broadened to cover veterans who have a service-connected disability or who are disabled.

(6) The maximum grant to any institution is lowered from $136,000 to $75,000.

(7) The percentage of funds which an institution must use to carry out the required services of the program is increased from 75 percent to 90 percent.

Invitation To Comment

Interested persons are invited to submit comments and recommendations regarding these proposed regulations. Written comments and recommendations may be sent to the address given at the beginning of this preamble. All comments received on or before March 2, 1981, will be considered in the development of the final regulations.

All comments submitted in response to these proposed regulations will be available for public inspection, during and after the comment period, in Room 3514, ROB–3, 7th and D Streets, S.W., Washington, D.C. between the hours of 8:30 a.m. and 4:00 p.m., Monday through Friday of each week except Federal holidays.

Assessment of Educational Impact

The Department particularly requests comments on whether the proposed regulations in this document would require transmission of information that is already being gathered by or is available from any other agency or authority of the United States.

Citation of Legal Authority

A citation of statutory or other legal authority is placed in parentheses on the line following each substantive provision of these proposed regulations.

(Catalog of Federal Domestic Assistance No. 84.040, Higher Education Veterans' Cost-of-Instruction Program (VCIP))

Dated: December 22, 1980.

Shirley M. Hufstedler,

Secretary of Education.

The Secretary amends Title 34 Part 629 of the Code of Federal Regulations to read as follows:

PART 629—VETERANS' COST-OF-INSTRUCTION PAYMENTS TO INSTITUTIONS OF HIGHER EDUCATION

Sec.

Subpart A—General

629.1 Veterans' Cost-of-Instruction Payment program.

629.2 Eligible parties.

629.3 Ineligible parties.

629.4 Regulations that apply to the Veterans' Cost-of-Instruction Payments program.

629.5 Definitions that apply to the Veterans' Cost-of-Instruction Payments program.

Subpart B—What Kinds of Activities Does the Department Assist under This Program?

629.11 Required activities.

Subpart C—How Does One Apply for a Grant?

629.21 Application requirements.

Subpart D—How Does the Secretary Make a Grant?

629.31 Calculation of cost-of-instruction payments.

Subpart E—What Conditions Must Be Kept by a Grantee?

629.41 Expenditure requirements.

Authority: Section 420, Higher Education Act of 1965, as amended [20 U.S.C. 1070e–1), unless otherwise noted.

Subpart A—General

§ 629.1 Veterans' Cost-of-Instruction Payment program.

This program provides funds to institutions of higher education for the educational needs of veterans. Funds are used to establish and maintain a full-time Office of Veterans' Affairs which provides outreach and recruitment activities, counseling and tutorial services, and special programs for educationally disadvantaged veterans.

(20 U.S.C. 1070e–1)

§ 629.2 Eligible parties.

(a) *Criteria for initial eligibility.* An institution of higher education is eligible to receive payments under this part if the number of qualified undergraduate veteran students who are receiving benefits under chapter 31 or chapter 34 of title 38, United States Code (or who have received benefits under subchapter V or subchapter VI of chapter 34 while attending the institution during the academic year) equals at least 25 in number and at least one of the following:

(1) 110 percent of the number of such qualified undergraduate veteran students in attendance on April 16 of the preceding academic year.

(2) 10 percent of the total number of undergraduate students in attendance at the institution during the current academic year, if this number does not constitute a percentage of its undergraduate students which is less than the percentage for the preceding academic year.

(b) *Criteria for continuing eligibility.* An institution of higher education which is applying for assistance during an academic year following one during which it has received assistance under this part will be eligible to receive payments under this part if—

(1) The applicant meets the criteria for initial eligibility as defined in paragraph (a) of this section;

(2) The applicant has a percentage decline in the number of undergraduate veteran students receiving benefits under chapter 31 or chapter 34 of title 38, United States Code, no greater than the national percentage decline in the number of undergraduate veteran students enrolled in all institutions of higher education since the applicant's initial year of eligibility;

(3) The Secretary determines that the applicant is making a reasonable effort to recruit, enroll, and provide necessary services to veterans, taking into consideration the extent to which the number of persons referred to in paragraph (a) of this section falls short of meeting the ratio criteria set forth in that paragraph.

(c) *Criteria for renewed eligibility.* An applicant which has qualified for payment during any preceding fiscal year, but subsequently became ineligible, is eligible to receive payments under this part if—

(1) The applicant would have been eligible had paragraph (b) of this section been in effect when the applicant became ineligible;

(2) The applicant has had a full-time office of veterans' affairs since its last year of participation in the program; and

(3) The appropriations made available during the fiscal year in which the award would be made are in excess of—(i) $14,380,000, or (ii) the amount requested in the President's budget, whichever is greater, by an amount sufficient to make payments to all institutions meeting the requirements of paragraphs (c)(1) and (c)(2) of this section.

(20 U.S.C. 1070e–1)

§ 629.3 Ineligible parties.

School or departments of divinity and proprietary institutions are not eligible to receive assistance under this part.

(20 U.S.C. 1070e–1)

§ 629.4 Regulations that apply to the Veterans' Cost-of-Instruction Payments program.

The Education Department General Administrative Regulations (EDGAR) in 34 CFR Part 75 (Direct Grant Programs) and 34 CFR Part 77 (Definitions) and the regulations in this part 629 apply to the Veterans' Cost-of-Instruction Payments program.

(20 U.S.C. 1070e–1, 1080, 1141)

SAMPLE 6

NOTICE OF FINAL REGULATIONS IN THE FEDERAL REGISTER

DEPARTMENT OF EDUCATION

34 CFR Part 639

Veterans' Cost-of-Instruction Payments Program

AGENCY: Department of Education.

ACTION: Final regulations.

SUMMARY: The Secretary is issuing regulations for the Veterans' Cost-of-Instruction Payments (VCIP) Program. The regulations have been amended to reflect the changes to the program statute made by the Education Amendments of 1980, Pub. L. 96-374, and to reflect several administrative policy decisions. The changes affect the eligibility criteria, the required activities, and the payment process. The regulations have also been reorganized for the purposes of simplification and clarification.

EFFECTIVE DATE: Unless Congress takes certain adjournments, these regulations will take effect 45 days after publication in the Federal Register. If you want to know if there has been a change in the effective date of these regulations, call or write the Department of Education contact person. At a future date the Secretary will publish a notice in the Federal Register stating the effective date of these regulations.

FOR FURTHER INFORMATION CONTACT: Stanley B. Patterson. Telephone: (202) 245-2806.

SUPPLEMENTARY INFORMATION:

Summary of Comments and Responses

The Notice of Proposed Rulemaking setting forth the proposed amendments to the regulations governing the Veterans' Cost-of-Instruction Payments Program was published in the Federal Register on December 30, 1980. Interested persons were invited to submit written comments and recommendations within 60 days.

Several comments were received concerning the proposed regulations. After consideration of these comments, a number of the suggestions were incorporated into the regulations. The response to each comment is given below:

Comment. Several commenters questioned the choice of April 15 as the counting date under the new one-payment system (§ 639.6). An earlier counting date would give institutions more time to prepare their applications, and it would give the Department of Education more time to process the applications and mail the award notices. It would also allow many institutions to reflect higher veteran enrollment statistics.

Response. No change is made in the regulations. The program's data base contains past enrollment information based on an April 15 counting date. It is necessary to compare past data with current data to determine eligibility in some cases, and an accurate comparison requires that institutions continue to collect data on the basis of the April 15 counting date.

Comment. One commenter questioned the new regulatory requirement in § 639.11(b)(2) that an institution make an adequate effort to carry out outreach activities with a special emphasis on incarcerated veterans. The commenter cited recent reductions in V.A. benefits to incarcerated veterans and suggested that VCIP payments be increased to cover the cost of serving these veterans.

Response. No change is made in the regulations. This new provision results from a statutory amendment and cannot be revised through regulations. See 20 U.S.C. 1070e-1(c)(1)(C)(iii).

Comment. One commenter questioned § 639.1 of the proposed regulations which briefly outlines the services provided by the Veterans' Cost-of-Instruction Payments Program. The commenter asked why only part of the activities delineated in 20 U.S.C. 1070e-1(c)(1)(C) were included in this section of the regulations.

Response. No change is made in the regulations. The first section of the regulations (§ 639.1) contains a broad and brief statement outlining some of the services provided by the program. The establishment and maintenance of an Office of Veterans' Affairs is the means by which all services are provided to veterans. Reference to outreach, recruitment, counseling, tutoring, and special education programs is drawn from subsection (c)(1)(C)(i) of the statute (20 U.S.C. 1070e-1). The more specific activities delineated in 20 U.S.C. 1070e-1(c)(1)(C)(ii)—(c)(1)(C)(v) are not of secondary importance. However, they were not included in the opening statement because they are already required by § 639.11 of the regulations.

Comment. One commenter questioned the eligibility requirements in § 639.3(a) of the proposed regulations which allow the counting of veterans who are currently receiving subchapter V benefits. The commenter asked why the regulations were restricted when the statute allows additional payments for veterans who have ever received subchapter V or subchapter VI benefits.

Response. No change is made in the regulations. Section 639.3(a) of the regulations specifies the types of veterans which can be counted for the purpose of determining if an institution is eligible. This veteran enrollment count is consistent with the requirements of 20 U.S.C. 1070e-1(a)(1)(A). Section 639.31(b) of the regulations addresses the calculation of payments and allows veteran students to be counted "who have *ever* received educational assistance under subchapter V or subchapter VI of chapter 34 of Title 38 * * *" This section of the regulations comports with 20 U.S.C. 1070e-1(b)(1)(B).

Comment. One commenter asked why the regulations require that grantees make an adequate effort to provide outreach services with a special emphasis on "handicapped veterans" when the statute reads "other disabled or handicapped veterans."

Response. The phrase, "other disabled or," has been added to § 639.11(b)(2) of the regulations for the purpose of clarification. See 20 U.S.C. 1070e-1(c)(1)(C)(iii).

Comment. One commenter asked if the Secretary of Education and the Administrator of Veterans' Affairs consulted on the regulations as required by the statute.

Response. The original regulations for the Veterans' Cost-of-Instruction Payments Program were created in 1973 in consultation with staff from the Veterans' Administration, and all subsequent revisions have been reviewed and approved by that agency. The final regulations will be jointly promulgated by the Administrator of Veterans' Affairs and the Secretary of Education. See 20 U.S.C. 1070e-1(c)(1)(C).

Comment. One commenter asked why § 639.11(b)(4) of the proposed regulations cited "Section 620 of Title 38" in relation to the readjustment counseling program when the statute cites "Section 612A of Title 38."

Response. In § 639.11(b)(4) of the proposed regulations, an erroneous reference is made to Section 620 of Title 38, United States Code. The correct reference is Section 612A of Title 38, and the regulations have been changed accordingly. See 20 U.S.C. 1070e-1(c)(1)(C)(v).

Comment. One commenter questioned the use of the term, "vocational rehabilitation subsistence," in § 639.31(a)(1) of the proposed regulations when the statute refers only to "vocational rehabilitation."

Response. The reference to "vocational rehabilitation subsistence" in § 639.31(a) has been deleted as unnecessary in view of the definition of "veteran."

Comment. One commenter asked why payments will be made only for those veterans "to whom services required under the terms of a grant will be reasonably accessible." The statutory provisions do not contain this restriction.

Response. The phrase, ". . . and to whom services required under the terms of a grant will be reasonably accessible," has been deleted from § 639.31 of the regulations. The statute does not warrant its inclusion in this section concerning the calculation of payments. Section 639.11(c) of the regulations adequately addresses the accessibility of veterans' services.

Comment. One commenter asked why payments are made based on quarter intervals of enrollment (full-time, three-quarter-time, half-time) rather than on an overall percentage of enrollment.

Response. No change is made in the regulations. The statute for the Veterans' Administration which governs the payment of educational assistance to veterans (Title 38, United States Code) and is the basis by which VCIP veteran enrollment is calculated, specifies that "eligible enrollment" be full-time, three-quarter-time, and half-time (Section 1682(a)(1), subchapter IV). In addition, other higher education programs use quarter-time computations for calculating enrollment information. The use of this method of computation is a part of the Department's efforts to standardize its regulatory provisions. This method is also an administrative convenience for institutions of higher education whose enrollment classification is on a half, three-quarter, and full-time basis.

Comment. One commenter suggested that § 639.31(a)(2) of the proposed regulations be clarified to explain that the payments calculated in this section are in addition to those computed under § 639.31(a)(1).

Response. The word "additional" has been inserted in § 639.31(b) (formerly § 639.31(a)(2)) to clarify the meaning of this subsection: "For students meeting this requirement, a grantee receives the following additional payments * * *"

Comment. One commenter questioned § 639.31(b) of the proposed regulations which reads, "No payments will be made to grantees for students who are not full-time, three-quarter-time, or half-time students." The commenter cited the statutes's prohibition of payments for less than half-time students but questioned the statutory basis for payments based on fixed percentages.

Response. Payments will be made for all students who are in attendance on at least a half-time basis. The use of fixed percentages in calculating enrollment information is an administrative convenience both to the Department of Education and to institutions of higher education, and is a part of the Department's efforts to standardize its regulatory provisions. However, § 639.31(b) of the proposed regulations has been deleted as an unnecessary provision, and another provision of the regulations has been designated as § 639.31(b). The definitions in § 639.6(b) clearly state that a "student" means a person in attendance at an institution of higher education on at least a half-time basis.

Comment. One commenter questioned the reference to paragraph (b) rather than paragraph (c) as the limiting section in § 639.31(d) of the proposed regulations.

Response. The reference to paragraph (b) in § 639.31(d) of the proposed regulations is incorrect. Paragraph (c) is the proper reference. However, § 639.31(b) of the proposed regulations has been eliminated and, as a result, § 639.31(c) of the proposed regulations is § 639.33(b) in the final regulations. This reference to paragraph (b) as the limiting section in the final regulations, therefore, is correct.

Comment. One commenter asked why schools will not receive additional payments under § 639.31(a)(2) for other than service-connected disabled veterans when the statute allows additional payments for service-connected disabled veterans and other disabled veterans. The commenter also asked why the term "disabled" had not been defined.

Response. Section 639.31(b) (formerly 639.31(a)(2)) has been amended to read: "The number of qualified undergraduate veteran students who have ever received educational assistance under subchapter V or subchapter VI of chapter 34 of Title 38 or who have a service-connected disability as defined in Section 101(16) of Title 38, United States Code, or who are disabled in accordance with the definition of non-service-connected with respect to disability in Section 101(17) of Title 38, United States Code."

The reference to Section 101(17) of Title 38, United States Code, now clarifies the regulations with respect to determinations of disability under 20 U.S.C. 1070e-1(b)(1)(B). This section is now consistent with the statute's intent to allow payments for other disabled veterans in addition to "service-connected" disabled veterans.

the SEA. This local plan must devote particular attention to interagency planning, usually with a local rehabilitation services office. In most cases, the LEA is expected to use VEA funds for direct instructional services of a vocational nature, but it should use the special education funds to provide (or contract for) the provision of related services--such as transportation, recreation, medical diagnosis and screening, speech pathology, or psychology--that aid the special education student.

- Comprehensive Employment and Training Act (CETA)--Since the first CETA Act of 1973 (P.L. 93-203), the objectives of CETA grants have oscillated between public service employment (counteracting cyclical unemployment) and specific vocational training (helping "hard-core" unemployed persons develop marketable skills).

  One trend has been constant, however. There has been an increasing emphasis on local cooperation among employment security offices, economic development agencies, rehabilitation services offices, and vocational-technical institutions. This interagency cooperation is fostered at the state level by the specific requirement that a planning committee meet four times per year, with representation from (1) the community college board and/or board of higher education; (2) the state advisory council for vocational education; (3) the CETA employment and training council; and (4) administrators, teachers, and board members at the local level.

  Similarly, P.L. 94-482 (the Education Amendments of 1976) requires that a State Occupational Information Coordinating Committee (SOICC) meet, consisting of members from the state board of education, the department of rehabilitation services, the bureau of employment security, and the CETA agency.

  It should be noted that, at the time of this writing, funding for CETA programs has been reduced, and its future is unclear. However, government-sponsored efforts of this type will likely continue in some form, and you should both keep abreast of these efforts and take advantage of these opportunities for cooperative planning and collaboration.

All of these plans, regardless of the statute or regulation that institutes them, have several procedural points in common. First, they require the participation of representatives from a broad base of agencies and institutions, involving varied interests, resources, and purposes.

Second, they require the reconciliation of the objectives of a plan at one level with those of a plan at adjacent levels. This does not necessarily imply that a plan of an LEA or a multicounty district must comply with an existing statewide plan. In many cases, quite the contrary could be true--the state plan is a composite of the local plans that it comprises.

Third, planning is inextricably associated with intergovernmental fund transfers. The existence of a formal plan is a prerequisite for the receipt

of funds. Subsequently, the plan itself becomes the rationale by which funds are further allocated or the criterion by which a decision might be made not to fund certain activities.

Finally, the planning process involves both rational and political mechanisms. To the extent that (1) information is accumulated and analyzed and (2) alternatives are generated and then compared in terms of their anticipated outcomes, the process is rational. However, the presence of conflict (not everyone's ideas and objectives can receive top priority) means that the process must also become political, requiring negotiation and compromise. Furthermore, the planning committees have a political aspect in that their members are usually appointed by elected officials.

Constructive Intervention in the Law/Rule/Plan Development Process

The law- and rule-making processes described on the preceding pages are open. As an administrator of a local institution--yet, as a voting, taxpaying citizen--you have the right and the civic duty to influence the development of laws, rules, and plans in whatever way your conscience and intelligence may direct. Let's look at specific means at your disposal.

Gaining Access to the Legislative Process

Perhaps the points of entry to legislative action have already occurred to you. The most direct one for you is to seek access to a legislator. Since this approach--contact with an individual--is common to all three situations (law, rule, and plan making), we will discuss it in more detail shortly.

Second, you have the right to ask to present testimony regarding pending legislation. This testimony could consist of a personal appearance before a committee of congress or the legislature (see sample 7). Alternatively, it could consist of written remarks, a summary of a research project, or even a thoughtful, relevant article from a professional journal, which you submit for the committee members' consideration at their leisure.

Third, you alone, you and several colleagues, or you working through a formal association can become proactive rather than merely reactive. It is feasible actually to draft a bill and then to ask a legislator to sponsor it or to work together with him/her to write a bill that meets your concerns and follows the needed format.

Fourth, as a modification of the bill-drafting step, you can contact a legislator or a subcommittee and offer to assist during the markup of a bill. Markup is the rewriting process that often takes place after hearings have been held but before the bill is reported out of committee. Remember that most legislators are specialists in the peculiar language of the law, but they are still laypersons in terms of the particular subject matter of the legislation. If courteously approached, they might welcome your assistance

SAMPLE 7

TIPS ON TESTIFYING IN A LEGISLATIVE HEARING

- Prepare a written statement with copies for committee members. Use the statement as the basis for your presentation; however, you may wish to speak from a good outline or to alter the order depending on the style that suits you or the remarks made by previous speakers.
- When you arrive, ask for a witness slip; fill it out and return it to chairperson.
- Identify yourself and begin with a concise statement of your position on the bill and your main reasons for support or opposition.
- Refer to specific code sections and line numbers in the bill so the committee can follow as you speak.
- Choose facts and data that relate to the points you want to stress and select those with which committee members can identify. Be careful not to distort by your selection of statistics--your credibility and accuracy are important assets.
- Point out specifically how the bill will address the problem.
- Speak slowly and clearly so you can be heard.
- Talk to the committee only, not to the audience.
- Don't repeat points that have been covered adequately by previous witnesses.
- Be prepared for questions from legislators, but don't feel you need all the answers. When you don't know, say so. If answers can be found, get back to the questioner.

SOURCE: From "There Ought'a Be a Law," brochure published by the Ohio League of Women Voters, Columbus, OH, 1981.

in expressing desired concepts in language that is clear to those who would be affected.

Finally, you can issue a news release, call a press conference, or otherwise make the public aware of an issue and thus stimulate their contact with legislators in whatever manner they choose.

Gaining Access to the Rule-Making Process

As in the legislative arena, you can seek access to those officials who will be drafting rules or regulations. This contact could also result in something akin to markup, whereby you submit proposed language for parts of the proposed rules.

Finally, you have the same right as other citizens to respond to Notices of Proposed Rule Making, following the procedures described when the NPRM appears in the Federal Register (or following similar procedures when state governments or other agencies issue tentative rules in analagous ways).

Participating in Planning Processes

Again, you should seek to communicate with those who will be developing state, regional, or local plans.

More directly, you could seek appointment to those advisory or governing committees that are assigned a planning function.

Third, you should respond, in either an individual or institutional capacity, when planning committees ask for information on which to base planning decisions. They may seek documentary submissions or oral testimony at preliminary sessions.

Fourth, you should review copies of plans whenever they are issued in draft form by a committee. The committee usually asks for comments at this stage, using a device such as an NPRM. If you have an opinion, express it, and substantiate it with logical sets of data or arguments.

Keeping Informed

It does no good for you to express opinions for which you have no factual basis. Nor is it prudent for you to contact a legislator or government official about a matter that is not currently under discussion or (worse yet) that has already been decided. Therefore, you should know what information sources, such as the following, are available to help you keep abreast of law- and rule-making activities:

Legislative directories. These directories list all members of a legislature, their district, political party, committee appointments, and mailing

address. They also show who are the legislative leaders: speaker or president pro tem of each house, majority and minority leaders and "whips," committee and subcommittee chairpersons. (See sample 8.)

Legislative information office. This is a service provided by the legislature itself, often through a toll-free telephone number, that provides up-to-the-minute information on the status of a bill: whether it has just been introduced, has been referred to a committee, is in hearings, is on the floor of a house being debated, or is awaiting the President's/governor's signature.

Clerks of the house and senate. Similar information about the status of bills is available from the clerk's office of each house; the bills' numbers will also be listed in the legislative directory. Upon request, the clerk will send you a copy of a bill in its most recent form.

Legislative status chart. These charts are provided in the newspapers of larger cities on a weekly basis (probably daily in the capital city paper) or in professional periodicals such as the Chronicle of Higher Education and VocEd, the AVA journal. In many cases, such a report will also list those committee hearings scheduled for the next one to two weeks.

Organizational brochures. Your professional organization is likely to maintain a roster of key legislative and administrative personnel, as well as current information on bills likely to be of interest to you. General-interest citizens' lobbying groups, notably Common Cause and the League of Women Voters, also maintain this information (although over a broader range of topics). They also prepare voting records and brief biographical sketches of all legislators.

General news media. Political news is one of the key focal points of newspapers, news magazines, radio and television programs, and association newsletters. Read such articles closely, however. Headlines often make it appear that a law has been enacted, whereas the fine print might state only that a key committee or caucus vote has occurred. As you know, with your new understanding of the full legislative cycle, "there's many a slip between the cup and the lip." Many a bill, after having been reported out of committee with a favorable recommendation, gets tied up in political disputes and never becomes law.

Communicating with Public Officials

The basic means by which we traditionally interact with the legislative process is through letters to legislators. The same process is also an effective means for interacting with other officials involved in rule making and planning. In either case, your communication efforts ought to be broadened beyond writing and beyond making contact only when you want something from a particular legislator or official.

SAMPLE 8

PORTION OF A LEGISLATIVE DIRECTORY

OHIO LEGISLATIVE DIRECTORY
114th General Assembly 1981-82

OHIO VOCATIONAL ASSOCIATION
6460 N. High Street
Worthington, Ohio 43085
Phone (614) 885-1881

JACK FRESH
Executive Director

ROSEMARY KOLDE
Legislative Chairperson

Ohio Members of Congress

UNITED STATES SENATORS

Washington Address:
Senate Office Building
Washington, D. C. 20510
Telephone (202) 224-3121

Glenn, John H. (D) Office:
200 North High Street, Room 648
Columbus, Ohio 43215
(614) 469-6697

Metzenbaum, Howard (D) Office:
1240 East 9th Street
Cleveland, Ohio 44199
(216) 522-7272

UNITED STATES REPRESENTATIVES

Washington Address: House Office Building
Washington, D.C. 20515 Telephone (202) 224-3121

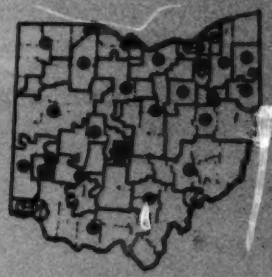
DIST.	NAME	PARTY	OHIO ADDRESS	TELEPHONE
10	Applegate, Douglas	(D)	916 Ohio Valley Tower, Steubenville 43952	(614) 283-3719
17	Ashbrook, John M.	(R)	53 South Main Street, Johnstown 43031	(614) 967-9691
7	Brown, Clarence J.	(R)	339 Post Office Building, Springfield 45501	(513) 325-0474
20	Eckart, Dennis E.	(D)	24700 Chagrin Boulevard, Beachwood 44122	(216) 522-2150
1	Gradison, Willis D. Jr.	(R)	Room 6002, 550 Main Street, Cincinnati 45202	(513) 684-2456
4	Guyer, Tennyson	(R)	Room 205, 401 West North Street, Lima 45801	(419) 227-6245
3	Hall, Tony P.	(D)	200 West 2nd Street, Dayton 45402	(513) 225-2843
6	Hollenbeck, Thomas N.	(R)	648 High Street, Hamilton 45011	(513) 868-5858
5	Latta, Delbert L.	(R)	Room 102, 300 South Main St., Bowling Green 43402	(419) 352-5271
2	Luken, Thomas A.	(D)	Room 3028 Federal Building, Cincinnati 45202	(513) 684-2723
9	McCain, Bob	(R)	Room 291 Federal Building, Willoughby 44094	(216) 522-4022
18	Mottl, Clarence E.	(D)	212 South Broad Street, Lancaster 43130	(614) 654-1148
22	Nixon, Ronald M.	(D)	2061 New Federal Building, Cleveland 44199	(216) 522-4382
20	Oakar, Mary Rose	(D)	Room 523, 215 Superior Avenue, Cleveland 44114	(216) 522-4207
13	Pease, Donald J.	(R)	1668 Cooper-Foster Park Rd., Lorain 44053	(216) 282-5866
16	Regula, Ralph S.	(R)	4150 Belden Village St., N.W., Canton 44718	(216) 499-4414
14	Sawyer, John F.	(D)	Room 405, Federal Building, Akron 44308	(216) 375-5710
12	Stanton, Bob	(R)	300 North High St., Rm. 405, Columbus 43215	(614) 469-7340
11	Stokes, J. William	(D)	170 North St. Clair Street, Painesville 44077	(216) 352-5497
21	Stokes, Louis	(D)	2947 New Federal Building, Cleveland 44199	(216) 522-4900
9	Weber, Ed	(R)	414 North Erie, Suite 100, Toledo 43624	(419) 242-0379
19	Williams, Lyle	(R)	3975 Youngstown Road, S.E., Warren 44484	(216) 369-4378
15	Wylie, Chalmers P.	(R)	300 North High St., Rm. 560, Columbus 43215	(614) 469-5614

RECAPITULATION

Republicans	13
Democrats	8
Total	21

OHIO SENATE

(State House, Columbus, Ohio 43215)



President, Paul E. Gillmor 466-8060
President Pro Tempore, Theodore A. Ney (R) 466-8060
Asst. President Pro Tempore, Stanley J. Aronoff 466-8060
Minority Leader, Harry Meshel 466-8060
Asst. Minority Leader, Paul F. Gaunt, Jr. 466-8157
Minority Whip, Charles L. Butts 466-8060
Minority Floor Leader, Timothy Hoffmann 466-8060

DIST.	NAME	PARTY	ADDRESS	TELEPHONE
9	Arnold, Stanley J.	(R)	700 Tri-State Building, Cincinnati 45202	(513) 241-5465
3	Brown, William F.	(R)	3960 Reading Road, Cincinnati 45229	(513) 281-3440
29	Butts, Charles L.	(R)	4745 Storer Avenue, Cleveland, 44102	(216) 631-6060
27	Conroy, Thomas E.	(R)	605 North Ward Avenue, Girard 44420	(216) 545-1645
17	Collins, Stanley C.	(R)	1555 Kenny Lane, Toledo 43615	(614) 537-2460
30	Cox, Kenneth R.	(R)	4665 East Park Avenue, Barberton 44203	(216) 745-5991
8	Cowan, Charles J.	(R)	30 Constitution Avenue, Dayton 45419	(513) 293-5172
10	Dattilo, Michael	(R)	2007 Colley Road, Cedarville 45314	(513) 766-2880
7	Fixel, Richard H.	(R)	3900 Shannon Road, Cincinnati 45213	(513) 531-5191
1	Gaunt, M. Ben	(R)	240 Sunset Drive, Defiance 43512	(419) 782-5481
2	Gillmor, Paul E.	(R)	Ohio Senate, State House, Columbus 43215	(614) 466-8060
3	Gray, Theodore M.	(R)	Ohio Senate, State House, Columbus 43215	(614) 466-8060
21	Jackson, M. Howie	(D)	1720 East 79th Street, Cleveland 44103	(216) 432-1182
15	Kinsch, John R.	(R)	65 North 10th Street, Wadsworth 44281	(216) 335-5765
4	Lukens, Donald E.	(R)	Ohio Senate, State House, Columbus 43215	(614) 466-8060
26	Meiss, Paul R.	(R)	2850 King James Parkway, Westlake 44145	(216) 835-5460
19	Mason, Steven D.	(R)	211 South Main Street, Sidney 45365	(513) 492-6991
31	McCormick, Timothy	(R)	170 East 200th Street, Euclid 44123	(216) 531-5900
28	Meshel, Harry	(D)	Ohio Senate, State House, Columbus 43215	(614) 466-8060
13	Nadenbousch, Ronald L.	(R)	915 Middle Ridge Road, Amherst 44001	(216) 988-2979
27	Oswald, Oliver	(R)	1555 Connell Road, Northfield 44067	(216) 467-0880
25	Porter, Paul E.	(R)	201 South Prairie Street, Smyrna 44680	(216) 882-7782
33	Ross, William J.	(R)	100 Tomahawk Ave., R.W., New Philadelphia 44663	(216) 364-5991
5	Roberts, Marcus A.	(R)	3277 Summit Road, Ravenna 44266	(216) 296-2991
16	Schneidermeyer, Michael	(R)	700 East 19th Avenue, Columbus 43201	(614) 294-6982
22	Stall, Ben W.	(R)	13871 Cedar Road, South Euclid 44118	(216) 932-0990
14	Snyder, H. Cooper	(R)	Wallace Road, Chesterland 44067	(216) 729-3566
18	Suhadolnik, Stan	(R)	R.R. 2, Box 70, New Concord 43762	(614) 452-6991
24	Schnabach, Gary C.	(R)	6243 Pavilion, Road, Parma Heights 44130	(216) 888-5884
11	Vellapolis, Margaret	(D)	Box 445, Toledo 43697	(419) 243-9772
23	Van Meter, Thomas A.	(R)	1650 Country Club Lane, Ashland 44805	(419) 325-0172
32	Walsh, Thomas F.	(R)	5121 Dublin Circle, N.W., Canton 44720	(216) 478-2177
6	Zimmer, Paul F., Jr.	(D)	7011 Taylorsville Road, Dayton 45424	(513) 236-7164

RECAPITULATION

Republicans	19
Democrats	13
Total	32

Consider what approaches you would use if you were attempting to sell that same person a product or service. First of all, you would use the most personal medium possible--a private meeting, if possible. Next most effective would be a group meeting or a personal phone call. A personal letter, perhaps even a handwritten note, would be almost as satisfactory. Only when you wanted to "blanket" a large number of persons (with small hope of response from any of them) would you resort to a form letter, a mass-produced flyer, or an unsigned brochure--but you wouldn't really expect either a high volume or a desirable quality of response when using this technique.

Next, you would like that person to know you in roles other than as a salesperson. You would speak to him or her at your place of worship, at club meetings, whenever you met on the street. After you sold something to the person, you might call periodically to see if he or she is still satisfied and to ask if you can help in any way.

The same is true in relations with your congressman/woman and state legislator. Try to become acquainted with them in routine settings--at social occasions, in regular meetings of groups in which you share an interest, or in special get-to-know-your-legislator sessions. If nobody else sponsors such an event, plan one yourself through your institution or professional organization.

Invite them to visit your institution--for an open house, for a special event such as vocational Olympics, or just for a private tour. If they're coming to make a presentation or receive an award, be certain to notify representatives of the press and invite them to cover the event.

The object is for you to provide something of value to the legislators--visibility, prestige, appreciation, or information. Then it's a fair bargain when you find it necessary to seek their support for your views about pending laws. A prominent retailer has commented, "There's no such thing as a good sale, only a good buy." If you can demonstrate to the legislator that being associated with your school, college, professional group, or cause is also in his/her interest, you are more likely to be favorably received the next time you visit, call, or write.

Beyond these general principles, there are some specific points to follow if you do find it appropriate to send a letter to a public official. Sample 9 shows the format your letter should follow. Sample 10 contains some useful guidelines on letter content and good correspondence manners.

Acting Systematically

Regardless of the extent to which you choose to become involved in law/rule making or planning or the manner in which you contribute information or express your comments, your activity will be more effective when you act as part of a system. This system could be an organization as formally structured as the American Vocational Association (AVA) or merely an informal meeting among you and your fellow administrators on a specific occasion.

SAMPLE 9

SAMPLE FORMAT—LETTER TO A MEMBER OF CONGRESS

(Personal Stationery or Plain Bond Paper,
Not Institutional Letterhead)

Your Address

Date

The Honorable _____
House of Representatives [U.S. Senate]
Office Address, if available
Washington, DC 20515 [Senate 20510]

Dear Congressman/Congresswoman [Senator] _____:

Introduction	- Identify yourself. - Make brief reference to your occupation, business, or organization.
Purpose of Letter	- Explain why you are writing. - Refer to bill by name and number, if appropriate. - Give facts and/or figures to support your views.
Closing	- Request a reply indicating his/her position regarding the issue. - Thank the member of Congress for his/her consideration of your position.

Sincerely,

Your Name

SOURCE: From leaflet published by Ohio Vocational Association, Columbus, OH, 1981.

SAMPLE 10

POINTERS ON WRITING A LETTER TO A LEGISLATOR

1. Basic Fundamentals:

   - The letter should be timely--Sometimes a bill is out of committee or has been voted on before a letter arrives. Inform your Congressman/woman while there is time to take effective action.
   - Be reasonably brief--Every working day the mail carrier leaves the legislator 150 or more pieces of mail. All of this mail must be answered while studying legislation, attending committee meetings, and participating in debate on the floor. Many issues are complex, but your opinions and arguments stand a better chance of being read if they are stated as concisely as the subject matter will permit (e.g., 1-2 pages in length). It is not necessary that letters be typed--only that they be legible.
   - Identify the bill of issue--About 20,000 bills are introduced in each session of Congress; it is important to be specific. If you write about a bill, try to give the number or popular title (e.g., truth in lending, minimum wage).

2. Do's When Writing to Legislators:

   - Be constructive--If a bill deals with a problem you admit exists, but you believe the bill is the wrong approach, do not hesitate to suggest a more logical approach.
   - Write your own views--A personal letter is better than a form letter or signature on a petition. Many people sign a petition without reading it to avoid offending the circulator; form letters are readily recognizable--usually registering the sentiments of the person or lobbying group preparing the form. Form letters often receive form replies.
   - Give your reasons for taking a stand--Statements such as "vote against H.B. 100; I'm bitterly opposed" don't help. But a letter that says, "I'm a vocational teacher, and H.B. 100 will handicap our high school program for the following reasons . . ." tells more. Perhaps the legislator didn't know all the effects of the bill, and your letter will help show what it means to an important segment of his/her constituency.
   - If you have expert knowledge, share it with your Congressman/woman--Of all the letters pouring into the office of a member of Congress, perhaps one in a hundred comes from a constituent who is knowledgeable on that subject. The opinions expressed in the other letters are important and will be heeded, but this one is a real gold mine for the conscientious member. After all, in the next few months he/she will vote on farm, defense, transportation, space, health, education, housing, and veterans' bills, and a host of others. He/she can't possibly be an expert in all these fields; many constituents are knowledgeable in some. Their advice counsel is appreciated.
   - Say thank-you when it's deserved--Members of Congress are human, and they appreciate an occasional "well done" from people who believe they did the right thing. But even if you think he or she voted wrong on an issue, he/she would still welcome a letter.

SOURCE: From leaflet published by Ohio Vocational Association, Columbus, OH, 1981.

3. Don'ts When Writing to Legislators:

- Don't become a "pen pal"--When legislators send out a newsletter appealing for more constituent mail, they are not soliciting quantity, but rather quality. One of the pet peeves on Capital Hill is the "pen pal" who weighs the mail down every few days with long tomes on every conceivable subject.
- Don't pretend to wield political influence--Write your Congressman/woman as an individual--not as a self-appointed spokesperson for your neighborhood, community, or industry. Unsupported claims to political influence will cast doubt upon the views you express.
- Don't demand a commitment before the facts are known--If you have written a personal letter and stated your reasons for a particular stand, you have a right to know the current thinking on the issue. Writers who demand to know how a legislator will vote on a bill should bear legislative realities in mind. On major bills, there are two sides to be considered, and you may have heard only one. The bill may be 100 pages long with 20 provisions in addition to the one you wrote about, and he/she may be forced to vote on the bill as a whole, weighing the good with the bad. It makes little sense to adopt a firm and unyielding position before witnesses have been heard or a study has been made of the bill in question. A bill rarely becomes a law in the same form as introduced. It is entirely possible that you would not support the bill in the form in which it is finally submitted to the floor.
- Don't make threats or promises--Members of Congress usually want to do the popular thing, but this is not their only motivation. Nearly all the members want to do what is best for the country. Writers have the privilege of making assertions, but such assertions rarely intimidate a conscientious member and may, in fact, generate an adverse reaction. The Congressman/woman would rather know why you feel so strongly; the reasons may change his/her mind.
- Don't berate your Congressman/woman--You can't hope to persuade a member of Congress to accept your views by calling him/her names. If you disagree with him/her, give reasons for your disagreement. Try to keep the dialogue open.

4. Also, Keep These Points in Mind:

- Spell the legislator's name and title correctly.
- Be neat and legible.
- Identify yourself and your purpose for writing.
- Give a brief rationale for your request or position.
- Seek a reply from the legislator.
- Ask to be put on his/her newsletter list.
- Close with a thank-you.
- When he/she replies, WRITE AGAIN!
- Compliment him/her or encourage his/her reconsideration of the issues.
- Maintain close communication--try for a personal appointment.

What such a system does for you is to extend your capabilities to sense the need for political activity; the system provides you with additional eyes and ears. For example, the publications of many professional associations routinely carry articles or editorials alerting their members to the need for action or concern about many political issues. Moreover, these same periodicals usually contain routine news about the status of many bills currently under consideration by legislatures, Congress, or executive bureaus, enabling the reader to decide for him/herself which matters deserve attention. In a less formal manner, you might learn of pending legislation, rules, or plans from a friend at another institution, from a former colleague who now works at the state capital, or through your personal reading of business or general-interest publications such as the Wall Street Journal or Newsweek.

Once spurred to action, you can likewise use a system to amplify your response--as a louder voice or stronger arm. The professional association accomplishes this by enlisting the efforts of its many members or by synchronizing their activities. In the case of several such organizations, professional lobbyists can be retained or employed to work directly with legislators and officials. You can assist these efforts too, if by no other means than paying your dues or contributing directly to special lobbying campaigns or political action committees.

On the informal side of the picture, you can likewise ask your friends or colleagues to support your efforts in persuading officials to act (or vote) in certain desired ways. Alternatively, you can express your opinion publicly and hope that the parents, organizations, and general citizens of your area will agree with you and add their voices to yours.

Summary

This information sheet has described three different forms by which public policy is expressed: laws, plans, and rules and regulations. The means by which they are developed differ somewhat, but the results are all related. Laws are enacted by the most formal process provided by American government--legislative deliberation in the halls of Congress or a state legislature. The skeleton of law is fleshed out by rules and regulations, which are authorized by legislators but are actually drafted by administrators within federal, state, and local governmental departments. Finally, both laws and rules allow, or require, that state, local, and regional bodies cooperate in the development of plans, usually regarding the systematic delivery of important services such as vocational education, rehabilitation, or health care.

The planning process is designed to be especially participatory, with citizen involvement invited at many stages. That fact should not diminish the fact, however, that legislation and rule-making activities are likewise intentionally open to public view and influence. Citizens in general--including local vocational-technical administrators--should feel welcome to add their two cents' worth.

The wheels of government are not guided by a sinister unseen hand; neither must they necessarily grind relentlessly over individuals or small institutions. A fundamental tenet of democratic political systems is that governments rule only with the consent of the governed. Ignorance and apathy are at odds with this tenet. The information in this learning experience should help you overcome any information gaps you may have perceived, thus dispelling ignorance. Through practice, you should also be able to develop a positive attitude that can likewise combat apathy.

You may wish to visit a legislative session. This could be (1) a floor session of one of the chambers (senate or house of representatives) of your state legislature or of the U.S. Congress or (2) a hearing of one of the committees of either body. You or your resource person might want to contact your legislator's office to secure a visitor's pass (if one is required) and to learn the schedule of sessions and hearings.

Try to secure in advance a copy of the bill being considered. When you attend, observe the various procedures used. To help structure your observation, you might wish to prepare in advance a list of the things to look for, such as the following:

- How many legislators are present? How they seated (e.g., according to party affiliation and seniority)?
- What is the current status of the bill (e.g., first hearing, reconsideration, recently reported out of hearing, nearing final vote)?
- Was the bill introduced in this chamber, or has the other chamber already acted on it?
- Is a floor leader or organizer of support/opposition apparent? Are any tactics--such as trivial amendments, roll-call votes, or calls for quorum--being used to delay action?
- Is much substantive action evident, or do you suspect that most of the discussion, deliberation, and persuasion is taking place behind the scenes?

You may wish to simulate (1) giving testimony at a legislative committee hearing or (2) receiving and considering such testimony.

Organize some of your peers (preferably those working under the supervision of the same resource person) into a mock committee of the legislature or Congress. Decide which bill (preferably a real one, perhaps dealing with a vocational education issue) you want to discuss. You and your peers can take turns serving as (1) members or the chairperson of the committee and (2) witnesses giving testimony before it.

The witnesses may portray themselves or play the roles of actual persons or positions (e.g., the executive director of AVA, the chairperson of a state board of education, an educational consultant, or a former student of vocational education). However, the information presented should be accurate and current (e.g., data on the employment rate of graduates of T & I programs, the rate of minority participation in health occupations, or per capita expenditures for students in technical colleges).

Based on the data presented orally to the mock committee (or contained in documents given to the committee staff), you and your peers could also develop a committee report containing proposed amendments and a statement urging passage of the bill.

You may wish to arrange through your resource person to visit an official who is involved in making rules and regulations or developing official plans. This might be a member of the executive branch at the state or federal level or a member of a state or regional planning commission staff.

During your visit, you might want to seek answers to questions such as the following:

- Where do most of the ideas originate that become enacted into laws, rules/regulations, or plans?
- What is and has been the role of individual vocational-technical administrators in affecting pending law and policy? What is the role of professional organizations?
- In what form does the official prefer to hear from constituents, lobbyists, and others having information or comments about pending laws?

You may wish to visit a meeting of a community organization (e.g., chamber of commerce, labor union, or League of Women Voters) that involves itself in political advocacy. Try to determine what issues they are concerned with, what their positions on these issues are, and how they organize to make their feelings known to the appropriate legislators or other officials.

Write a letter to (1) a member of Congress or a state legislator about a pending bill, (2) a state or federal administrator about proposed rules and regulations, or (3) a state, federal, or local official or planning committee member about a pending plan dealing with vocational-technical education or related matters.

Conduct whatever background work you feel is necessary to better prepare you for this letter-writing project. For example, learn about the bill/rules/plan itself, study the existing laws and policy that would be affected, get to know the person to whom you are writing, or whatever.

In order for your resource person to evaluate your competency, keep records that show the process, as well as the product, of your efforts. For example, keep notes of your research, a log of preliminary contacts you make, a list of the documents and persons from which you sought information, and so on.

Finally, prepare your letter in final form, ready to mail to the intended official. Then submit it to your resource person for evaluation. (He/she might very well recommend that you send it intact or might suggest changes to make before you finally dispatch it.)

After you have prepared the letter in its final form, submit it to your resource person for review and evaluation. Give him/her the "Letter Evaluation Checklist," pp. 39-40, to use in evaluating your work.

NOTES

Name _____

Date _____

LETTER EVALUATION CHECKLIST

Directions: Place an X in the NO, PARTIAL, or FULL box to indicate that each of the following performance components was not accomplished, partially accomplished, or fully accomplished. If, because of special circumstances, a performance component was not applicable, or impossible to execute, place an X in the N/A box.

	LEVEL OF PERFORMANCE			
	N/A	No	Partial	Full
In researching the issue affected by the proposed law/rule/plan, the administrator:				
1. secured a copy of the bill, the proposed rule/regulation, or the draft plan.....	☐	☐	☐	☐
2. studied the existing laws, rules, or plans that would be changed or superseded by the proposed ones....	☐	☐	☐	☐
3. acquired related information and literature from a professional organization, governmental department, colleagues, or other educational institutions.....	☐	☐	☐	☐
In selecting an appropriate individual to whom to address the letter, the administrator:				
4. followed one of the following courses of action:				
a. identified a legislator representing his/her own district or belonging to the committee to whom the bill was assigned.....	☐	☐	☐	☐
b. determined which official was the proponent of a proposed rule/regulation.....	☐	☐	☐	☐
c. identified a member of a planning committee or its staff.....	☐	☐	☐	☐
5. got acquainted with the addressee by such means as a phone call, personal visit, or introduction by a mutual associate.....	☐	☐	☐	☐

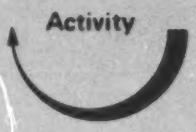
	LEVEL OF PERFORMANCE			
	N/A	No	Partial	Full
6. inquired through a professional organization or lobbyist about the addressee's professed views or voting record on this subject or his/her reputation for being able to persuade colleagues on important matters.....	☐	☐	☐	☐
When drafting the content of the letter, the administrator:				
7. identified the pending bill/rule/plan by a specific title, number, revision, or other clear label.....	☐	☐	☐	☐
8. stated a clear position toward the entire document or certain parts of it.....	☐	☐	☐	☐
9. cited relevant facts and figures or the opinions of notable, informed leaders in the field.....	☐	☐	☐	☐
10. stated how the proposed law/rule/plan would affect the writer and other constituents.....	☐	☐	☐	☐
11. clearly urged the addressee to take a definite position or certain action that was timely, legitimate, and constructive.....	☐	☐	☐	☐
12. requested a reply and thanked the addressee for his/her time.....	☐	☐	☐	☐
When preparing the letter in its final format, the administrator:				
13. used personal, rather than institutional, stationery...	☐	☐	☐	☐
14. spelled the addressee's name correctly and used the correct address and title (e.g., "The Honorable _____" if a legislator).....	☐	☐	☐	☐
15. typed legibly and spelled all words correctly.....	☐	☐	☐	☐
16. identified him/herself and his/her position.....	☐	☐	☐	☐
17. did not exceed a reasonable reading length (1-2 pages).	☐	☐	☐	☐

Level of Performance: All items must receive FULL or N/A responses. If any item receives a NO or PARTIAL response, review the material in the information sheet, "Developing Laws, Rules/Regulations, and Plans," pp. 9-35, revise your letter accordingly, or check with your resource person if necessary.

Learning Experience II

OVERVIEW

After completing the required reading, critique the performance of an administrator in a given case study in preparing and submitting required reports.



You will be reading the information sheet, "Preparing and Submitting Reports for Internal or External Uses," pp. 43-56.

You may wish to interview an official of a state, local, or educational agency who frequently prepares reports.

You may wish to examine the instructions for one or more reports regularly prepared by administrators or teachers.

You will be reading the "Case Study," pp. 59-60, and critiquing the performance of the administrator described.

You will be evaluating your competency in critiquing the administrator's performance in preparing and submitting required reports by comparing your completed critique with the "Model Critique," p. 61.

NOTES

Activity

For information about (1) why educational institutions are required to prepare and submit reports and (2) how the administrator can perform this task more easily, accurately, and efficiently, read the following information sheet.

PREPARING AND SUBMITTING REPORTS FOR INTERNAL AND EXTERNAL USES

Let's face it. The need to prepare reports frequently is not well received in administrative circles. There may not be any way that the information in the next few pages can counteract the connotation of evil that seems to surround long pages filled with blanks, accompanied by reams of directions in fine print. But let's try.

Purposes of Reports

If you must think of reports as evil, then try at least to perceive them as necessary evils. In fact, let's begin by considering for a moment why we have such things. Four of the most prominent and frequent rationales for reports are these: planning, funding, compliance, and control.

Planning. Reports for planning purposes might be retained within an institution or sent to an agency at the local, state, or federal level. Analysts at these levels can summarize the data from many institutions and detect trends that might indicate an impending need for new programs, buildings, resources, or knowledge. To facilitate these comparisons, however, information must be prepared in consistent form--consistent from year to year, from institution to institution, or from state to state.

Reports submitted for this reason often include such data as enrollments, degrees or diplomas granted, room occupancy rates, and community/feeder school census figures.

Funding. Most public educational institutions, as well as many privately supported ones, receive funds from at least one level of government. In most cases, the distribution of these funds is based on the number of students enrolled, usually classified according to type of program, grade level, or degree of special assistance required to overcome disadvantagement. The funding rate might also depend on the costs actually incurred or the institution's degree of support for special needs programs.

Therefore, reports submitted for funding purposes include such items as enrollment data, financial records, and descriptions of activities designed to aid students needing special tutoring, support services, counseling, or financial aid.

Compliance. Many of the governmental policies affecting education have been enacted to carry out broader social programs that are deemed to be in the public interest. Thus, educational institutions--just like the armed services, municipalities, and major government contractors--are required to follow practices that reflect fair pay for equal work, safe working conditions, sound childhood nutrition, human dignity, and equal employment/advancement opportunity, without regard to race, economic level, religion, sex, or physical impairment.

Reports having a compliance basis, like the two other types already mentioned, also call for enrollment data. These data must be classified not only with respect to vocational program and special needs but also in terms of areas related to the social program in question: minority status, gender, age, family income, veteran status, high school completion, physical impairment, prison record, and so on.

Compliance reports often ask for narrative descriptions of plans made and actual activities undertaken to resolve areas of previous noncompliance. For example, a college that formerly had no women faculty members might be required to state annually not only what percentage of the instructors are female but also what efforts it had exerted to recruit interested women, how many had applied or had been interviewed, what their qualifications were, and what starting salary had been offered them.

In many cases, "compliance" could mean that an institution is demonstrating, through a final project report, that it has accomplished the several tasks it had agreed to perform as part of a grant or contract from a government agency, private foundation, or corporate firm.

Control. Finally, reports can be used to exert administrative or fiscal control. In many cases, local administrators generate and use these reports internally. For example, teachers submit class attendance or enrollment reports on the first day of class. Administrators can use these almost immediately to adjust the size of classes in order to give teachers nearly equal loads--or at least to provide enough chairs.

Treasurers or business officers prepare spending reports on a regular basis (usually monthly). By comparing these with budget figures, administrators can detect expenditures that are higher than planned and impose new limitations to ensure that funds will not be overdrawn. Conversely, review of these reports can reveal a department that is spending far less than expected, precipitating a reexamination of activity levels and, perhaps, allowing a reallocation of funds.

Similarly, by analyzing placement data, administrators could determine that new efforts need to be made to help students find appropriate jobs. Or they could examine "time cards," noticing that one department is using a lot of overtime and hiring a new employee to help staff in that department accomplish their work more readily.

Established Reporting Systems

Since statistical data are so often used to make comparisons (whether with the past, with other institutions, or among states), it is useful to have data systems or taxonomies that provide common definitions of the items reported. The National Center for Educational Statistics (NCES), a part of the U.S. Department of Education, accomplishes this purpose to a certain extent. Its glossary of definitions and the formats of its reports determine to a large extent the definitions and formats used by state departments when requiring reports from local educational agencies.

Other efforts to achieve commonality and usefulness of data were affected by two notable federal laws: The Civil Rights Act of 1964 and the 1976 Amendments to the Vocational Education Act of 1963.

The Civil Rights Act of 1964 required that all federally aided educational institutions provide race and ethnic data to the Higher Education General Information System (HEGIS). (Provision of data to HEGIS was formerly voluntary.) HEGIS also provides information about enrollments, faculty salaries, finances, and facilities for postsecondary, degree-granting institutions. HEGIS is valuable insofar as it constitutes a reliable and consistent source of information for long-term comparisons. However, many educators believe that its categories pertaining to vocational education are too broad, and its methods of securing information too slow, to provide timely, useful data for day-to-day decisions at the state or local level.

Therefore, the National Vocational Education Data Reporting and Accounting System (VEDS) was viewed with some interest when it was formed by part of P.L. 94-482--the 1976 Amendments to the Vocational Education Act of 1963. Finally operational in 1978, VEDS includes information about vocational students, programs, program completers and leavers, staff, facilities, and expenditures. The data categories were designed specifically to serve the National/State Occupational Information Coordinating Committees (NOICC/SOICC) and programs under the Comprehensive Employment and Training Act (CETA).

VEDS involves a uniform set of forms by which the states must report this information. Unfortunately, the states have often have seen fit to modify these forms when securing information in turn from local agencies. When combined with differences in timing and means of collecting the information, these actions jeopardize somewhat the commonality of the data obtained.

The State Occupational Information Coordinating Committees (SOICCs) have been mentioned twice in this module: here and on p. 24. The SOICCs and their national counterpart, the National Occupational Information Coordinating Committee (NOICC), were set up by the Education Amendments of 1976 to develop, implement, and coordinate an occupational information system. One of the responsibilities of the SOICCs is to link those who use and those who develop labor supply-and-demand information.

As of this writing, each SOICC can provide employment projections--either directly or through agencies with which it collaborates--by specific occupations for areas within the state. These statistics are often presented by standard metropolitan statistical areas in the state, sometimes with all other areas lumped into the category, "balance of the state." SOICCs and their collaborating agencies can also provide professional analysts who can "treat" the relevant data for you and draw from it the conclusions you need.

Tips for Preparing Reports

Perhaps these suggestions will seem simple, even trivial. Nevertheless, much of the distress associated with reporting could be avoided by following them.

Read the directions. In most cases, the directions closely accompany the report form, often being printed on the back (see sample 11). This might mean that you always have to keep an extra copy of a blank form handy to avoid constantly turning the one you're filling out over and over. So be it. (If you ever join the bureaucratic elite and are responsible for designing a form yourself, remember that little annoyance. Give your colleagues a break, and print as many of the directions as you can on the face of the form--especially data entry codes (see sample 12).

If the directions are more complicated, they might be included in a separate booklet (see sample 13) or printed in a regulations book or general procedures manual or faculty handbook.

The ultimate in thorough direction-giving is to hold a meeting or workshop. This allows the creator/user of a report to meet directly with those who provide the information and prepare the feeder reports. Ideally, these persons would all work together to develop the instructions, or even the format of the report itself, in order to accommodate everyone's needs. If this is not possible, the workshop setting at least gives the report preparers an opportunity to ask questions about ambiguous directions or to practice filling out some sample forms.

(A side effect could be that an official, knowing that he/she may encounter some irate report-filler-outers face-to-face, will simplify and shorten the report, require it less frequently, or otherwise make the report more palatable.)

Submit the report on time. Directions usually highlight one item very prominently--the deadline. Don't just finish it on time; start it on time. Study the data requirements closely and anticipate how much time will be needed. Then add 20 percent to cover interruptions, your secretary's illness, blizzards, or interference from sunspots, and mark your calendar accordingly.

Few administrators have only one report to prepare. Gather together the instructions for all your assigned reports, and construct a master calendar.

SAMPLE 11

TYPICAL REPORT FORM

(FRONT OF FORM)

Name of Agency

SECTION F

Year

FINANCIAL INFORMATION

PAST EXPENDITURES FOR PROGRAM OPERATION	CATEGORIES	PROJECTED EXPENDITURES FOR PROGRAM OPERATION
	1	
$	INSTRUCTIONAL SALARIES	$
	2	
	INSTRUCTIONAL EQUIPMENT	
	3	
	OTHER INSTRUCTIONAL COSTS	
	4	
	GUIDANCE AND COUNSELING	
	5	
	ADMINISTRATION, SUPERVISION AND EVALUATION	
	6	
	TEACHER EDUCATION	
	7	
	RESEARCH AND DEMONSTRATION	
	8	
	CURRICULUM DEVELOPMENT	
	9	
$	TOTAL (Lines 1 through 8)	$
	10	
	TOTAL UNITS OF CREDITS TO BE EARNED IN OCCUPATIONAL PROGRAMS (estimated)	
	11	
	ESTIMATED COST PER UNIT OF CREDIT (Line 9 divided by Line 10)	$

(BACK OF FORM)

Section F
Financial Information

A tentative budget is requested from each agency which estimates the major expenditures for the proposed occupational program. The format for describing the tentative budget appears on the following page. To report past and projected federal/state/local expenditures, the categories listed below can be utilized. These are the same categories utilized by agencies in preparing the Annual Information Report (VE 500 series).

On preparing the tentative budget for the Local Plan, agencies should:

1. Report expenditures from the preceding fiscal year's Annual Information Report (VE-500 series) in the *left-hand column.*
   a. *Elementary Districts:* Information appears in Row 1 on the previous VE-500E.
   b. *Secondary Districts, Unit Districts, Community Colleges and State Agencies:* Information appears in Row 1, on the previous year's VE-501.
2. Estimate expenditures for the prepared Plan in the *right-hand column.*
3. Agencies are asked to estimate the cost per credit for operation of the occupational program. Obtain this figure by dividing the total estimated expenditures by the estimated number of occupational units generated by your agency.

Using the same categories listed in the Annual Information Report (VE-500 series), agencies should report the total federal/state/local expenditures for the following categories:

Instructional Salaries: Amount paid to occupational staff for their services, e.g., salaries.

Instructional Equipment: Amounts expended for instructional equipment, e.g., desks, tools, typewriters, etc.

Other Instructional Costs: Amounts expended which are not applicable to salaries or equipment, e.g., utilities, maintenance, space rental, etc.

Guidance and Counseling: Amounts expended for guidance and counseling services related to the occupational program, e.g., salaries, testing, career information, follow-up studies, etc.

Administration, Supervision and Evaluation: Amounts expended for salaries of administrative, supervisory, and evaluation personnel in occupational education.

Teacher Education: Amounts expended to upgrade the professional development of occupational staff, e.g., conference attendance, travel, etc.

Research and Demonstration: Amounts expended for developing new or pilot programs in occupational education.

Curriculum Development: Amounts expended to improve, upgrade curriculum, or initiate new occupational classes.

SAMPLE 12

TYPICAL REPORT FORM
(INSTRUCTIONS ON SAME SIDE)

STUDENT CLASSIFICATION FOR VOCATIONAL REIMBURSEMENT

_____ SEMESTER

MID-TERM DATE_____

NAME OF COURSE PERIOD OR BLOCK INSTRUCTOR

In the disadvantaged and handicapped column, place one (or more) of the numbers found at the bottom section of this page that best describes the student's disadvantaged or handicapped situation. Please list each student in alphabetical order by class (Seniors first) that was in your class at mid-semester

NAME OF STUDENT	M	F	YEAR IN SCHOOL	HANDICAPPED (Place number(s) from below.)	DISADVANTAGED (Place number(s) from below.)	SERVICES (Place numbers from below)
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						
11.						
12.						
13.						
14.						
15.						
16.						
17.						
18.						
19.						
20.						

HANDICAPPED CRITERIA

1. A person who is mentally retarded.
2. A person who is hard of hearing
3. A person who is deaf.
4. Has a speech impairment.
5. A person who is visually handicapped.
6. A person who is emotionally disturbed.
7. A person who is orthopedically impaired.
8. Other health impaired.
9. A person who is deaf and blind.
10. A person who is multiply handicapped.
11. Person with specific learning disability.

DISADVANTAGED CRITERIA

A. Economic
   1. Family income is at or below poverty level.
   2. Participant, parent, or guardian is unemployed.
   3. Participant of parent of participant is recipient of Public Aid.
   4. Participant is institutionalized or under state guardianship.

B. Academic
   1. Lacks reading skills.
   2. Lacks writing skills.
   3. Lacks mathematical skills.
   4. Performs below grade level (2 grades)

C. Limited English Proficiency
   1. A person who has limited English-speaking ability.

1. Special Counseling services
2. Psychological services
3. Social Work services
4. Speech and language services
5. Bilingual services
6. Special resource services
7. Facility modification
8. Scheduling modification
9. Curriculum modification
10. Materials modification
11. Career Resource Center
12. Staff conference (teacher/teacher)(teacher/counselor)(student/teacher)
13. Peer helper (tutorial services)
14. Special Occupational program
15. Staff training (Inservice)
16. Class size - (lower than average)
17. Testing, evaluation, special diagnosis of student of program
18. Special audio-visual media materials
19. Health services
20. Individualized instructional packages
21. Other (explain)_____

SAMPLE 13

TYPICAL REPORT FORM
(INSTRUCTIONS PROVIDED IN SEPARATE DOCUMENT)

INSTRUCTIONS -- Part IV - OCCUPATIONAL PREPARATION ENROLLMENTS

This Part provides data on 11th and 12th grade students who can be reported in a specific 6-digit OE code vocational program.

In general:

- the instructional programs you should include on this Part are those claimed on the VE-5 form during 1980-81 for which you received reimbursement, except 09.0100 which is reported on Part III;
- the students you should include on this Part are those 11th and 12th graders who have not been reported on Part III in a general program area (unless they are 09.0100 Part III enrollments);
- you will be reporting an annual cumulative enrollment count and a subcount of program completions.

Program Enrollments (Line 1):

Part IV enrollments must be unduplicated by 6-digit OE code programs. (See Instructions - Part III - Example b for directions on possible duplicated reporting of 09.0100 students). After determining which specific 11th and 12th grade students should be included, the following steps should be used to complete Part IV Program Enrollments (line 1):

1. Enter the appropriate 6-digit OE program codes and program names in column a. Your approved and reimbursed OE program codes are to be used to report Part IV enrollments except the following cooperative education codes:

01.9902	Agricultural Coop.
04.9902	Marketing (D.E.) Coop.
07.9902	Health Coop.
09.9902	Home Economics Coop.
14.9902	Office Coop.
17.9902	Industrial Coop.
18.9901	Cooperative Work Training (C.W.T.)
18.9902	Interrelated Coop.
18.9906	Special Education Coop.

In lieu of using these OE codes for reporting cooperative enrollments, use the program code most closely related to the latest job held by each student. Refer to the attached list of statewide Approved Occupational Programs to locate a proper code. Students you were unable to place in a job can be reported on Part III line 9, 18.00 Other. Reporting by this method will provide a better picture of the actual training these students are receiving.

All other enrollments should be reported by a 6-digit OE code for which you received approval and reimbursement for FY 1981. Review the definition of unduplicated headcount (See Definitions - Part III).

2. In Section A (line 1, column b) report the total unduplicate enrollment for each program.
3. In Section B (line 1, column c through l) distribute the enrollments by sex within racial/ethnic category. All students reported in Section A should be included. If a person refuses to identify his or her race/ethnicity, use institutional identification and assign one of the valid categories.
4. In Section C (line 1, column m, n and o) report any of the students in Section A who have been identified as handicapped, of limited English proficiency (L.E.P.) and disadvantaged. (These students are not necessarily being provided special services through vocational education, but they do fit the criteria for identification.) Students should be reported once in each category for which they have been identified, i.e., the same student can be reported as handicapped and L.E.P., or handicapped and disadvantaged. Do not report the same student as L.E.P. and disadvantaged; while L.E.P. is a separate category for reporting, it is actually a type of academic disadvantagement and the source of funds for providing service is the same federal set-aside as for disadvantaged services. (See Definitions - Part III for Special Needs criteria.)
5. In Section D report the subcount of students who were enrolled in cooperative education courses/programs.

Program Completions (Line 2):

For each program in which you are reporting enrollments, report the subcount of enrollments which fit the definition of program completer; enter the data on line 2 for Section A, B, C and D.

Not all enrollments can be considered completions. Those students who do not take all courses which are considered by the institution to be an integral part of the program should be reported only as enrollments.

Most 11th grade students should be reported only as enrollments. Only if an 11th grader has actually completed a defined vocational program by the end of the 1980-81 school year should he/she be reported as both an enrollment and a completion.

Do not report any student as a completer who was not also reported as an enrollment; to be considered a 1980-81 completer, the student must have been enrolled at least one term during the 1980-81 school year.

After determining which enrollments also fit the definition of completer, the following steps should be used to complete Part IV Program Completers (line 2):

1. In Section A (line 2, column b) report the total completers for each program.
2. In Section B (line 2, column c through l) distribute the completers by sex within racial/ethnic category.

3. In Section C (line 2, column m, n and o) report the counts of completers who have been identified as handicapped, of limited English proficiency and disadvantaged.

4. In Section D (line 2, column p) report the number of completers who were enrolled in cooperative education courses/programs.

IMPORTANT: Keep in mind that the students reported as completers become part of the follow-up universe for next spring.

If your district is scheduled for an on-site visitation during FY 1983, you will be involved in the follow-up process during the Spring of 1982. This process can be simplified if you maintain an accurate record of the students reported as FY 1981 completers and the characteristics as reported in columns b through p. You will be reporting these same items in addition to survey response items.

The students included in the survey will be those reported as 1980-81 completers on this report and students you can identify as program leavers at the time you conduct the survey. Program leavers will refer to anyone who was enrolled during 1980-81, was reported on Part IV as an enrollment, was not reported as a vocational program completer, and has since left the institution without having finished the program.

For example, on the FY 1981 report an 11th grade student is reported as an enrollment in Stenography (14.0703). During the fall term of FY 1982, this student does not re-enroll at your institution and you determine that he/she did not take all courses needed to acquire entry-level job skills. This student would be considered a program leaver from FY 1981 and becomes part of the group to be surveyed.

BALANCING -- Part IV

To double-check the accuracy of your Part IV enrollment and completer report, the following conditions should be verified:

1. For each program (line 1 enrollment) column b should equal column c through l.

2. For each program (line 2 completers) column b should equal column c through l.

No balancing steps can be performed on column m, n, o and p since the entries are subcounts of the program enrollment. However, each column should be equal to or less than the total for each line.

Since line 2 completers are also counted in line 1 enrollments, all entries on line 2 should be equal to or less than the associated line 1 entry. They will only be equal if all program enrollments are also completers.

DEFINITIONS -- Part IV

(See Definitions - Part III for unduplicated count, racial/ethnic categories, special needs (handicapped, limited English proficiency, and disadvantaged)).

Cooperative Education - a program of vocational education for persons who, by written (and on file) cooperative arrangements between the school and employers, are employed and receive compensation, receive instruction, including required academic courses and related vocational instruction by alternation of study in school with a job in any occupational field. However, these two experiences must be planned and supervised by the school and employers so that each contributed to the person's education and his or her employability. Work periods and school attendance may be on alternate half days, full days, weeks, or other periods of time in fulfilling the cooperative program.

Occupational Preparation Programs - a planned sequence of courses, services or other vocational education activities specifically associated with a 6-digit OE code, designed to meet specific vocational objectives.

Program Completer - a student who finished a planned sequence of courses, services or activities designed to meet a vocational occupational objective that teaches entry-level job skills. This person must have met all the requirements of the institution for program completion whether or not he or she graduated from the institution. When applying this definition, analyze only the extent to which each student finished a vocational program. Use your own discretion to determine whether a student has acquired entry-level job skills.

District or Institution Name

– ISBE USE ONLY –

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PART IV - OCCUPATIONAL PREPARATION (11/12 Grades Only)

6-Digit OE Program Code (a)		SECTION A	SECTION B - RACIAL/ETHNIC AND SEX DESIGNATION										SECTION C - SPECIAL NEEDS			SECTION D
		TOTAL	American Indian/ Alaskan Native		Asian American/ Pacific Islander		Black Not Hispanic		Hispanic		White Not Hispanic		Handicapped	Limited English Proficiency	Disadvantaged	Co-op Students
		(b)	Male (c)	Female (d)	Male (e)	Female (f)	Male (g)	Female (h)	Male (i)	Female (j)	Male (k)	Female (l)	(m)	(n)	(o)	(p)
Name of Program																
Enrollments	1															
Completers	2															
Name of Program																
Enrollments	1															
Completers	2															
Name of Program																
Enrollments	1															
Completers	2															
Name of Program																
Enrollments	1															
Completers	2															
Name of Program																
Enrollments	1															
Completers	2															
Name of Program																
Enrollments	1															
Completers	2															

ISBE 21-01 (2/81) Column (b) = Columns (c) through (l) for each Line (COPY AS NECESSARY) Page 4 of 6

Your state department staff might provide you with a "comprehensive" list of deadline dates (see sample 14), but it usually includes only the reports they require you to prepare. Combine it with other assignments, calculate when "formula dates" fall each month (e.g., third working day of the month, every Friday, or second week of a fiscal quarter), and post them on one calendar.

If you use a desk calendar, form the habit each morning of checking several days ahead. On a wall-chart calendar, scan a whole week or month at a time, especially before a planned absence for a conference or vacation.

Routinize and automate. After just one experience with a report, you should be far wiser and more prepared for the next encounter. Prepare worksheets on which constant or relatively stable data are already entered. Alternatively, make a photocopy of the report from the previous period. Then "edit" it with current figures before submitting it to a clerk for retyping on a clean form.

Better yet, if you have the institutional capability, file the report on a memory typewriter, enter it into a word processor, or write it as a computer program. In each case, you can then devote your attention to only the variable data and save time thereafter by not having to retype the "boilerplate" words that surround the vital, changing statistics.

Modify your information system. Closely akin to the routinize/automate advice is this tidbit. Look at all your reports and devise a way to accumulate the units or bits of information in a central place. Then aggregate or summarize them in the unique way required by each report's format. In other words, don't require every student (or teacher) to fill out a separate form for each kind of report you have to do. You've merely multiplied your own burdens to others, not spread or diluted them.

To facilitate this process, you can employ a master enrollment or registration form. Construct it so that it can be coded for computer processing yet looks attractive to the subject and provides enough space for the sought-for entries! The "hard copy" of the form could be passed along from student to teacher to administrator to data-entry clerk until all the data are entered (see sample 15).

Maintain confidentiality and trust. The requirements of social programs often seem contradictory. Compliance reports might ask what proportion of your job applicants or student applicants belong to XYZ category, yet you're not allowed to ask them--at least, not directly--lest that status appear to influence the employment/admission decision.

Even if you are fair and impartial, you must still take extraordinary steps to assure your clientele of this attitute. (Consider dental health professionals. They not only keep their hands scrupulously clean; they also make an open, almost ostentatious, display of washing them within the patient's clear view.)

SAMPLE 14

CALENDAR OF DEADLINE DATES

CALENDAR OF DEADLINE DATES
1980-81 SCHOOL YEAR

ILLINOIS STATE BOARD OF EDUCATION
DEPARTMENT OF ADULT, VOCATIONAL AND TECHNICAL EDUCATION

Prior to implementation of program	Addendums to the Local One and Five Year Plan due in the Department of Adult, Vocational and Technical Education office.
60 days prior to implementation of Special Funding Agreements	All Special Funding Agreements due in the Department of Adult, Vocational and Technical Education office.
November - December	Sub-Regional In-Service Workshops on funding and planning.
December 1	Claims for ALL summer sessions, elementary programs, first term claims for secondary, post-secondary and adult programs due in the Department of Adult, Vocational and Technical Education office.
March 31	One and Five Year Plan for Vocational Education due in the Department of Adult, Vocational and Technical Education office (including equipment requests for Area Vocational Centers and post-secondary).
April 20	Claims for 2nd term secondary, post-secondary and adult programs due in the Department of Adult, Vocational and Technical Education office.
May 15	Claims for 3rd term post-secondary and final quarter secondary programs due in the Department of Adult, Vocational and Technical Education office.
July 15	Claims due in the Department of Adult, Vocational and Technical Education office for reimbursement of all Special Funding Agreements for the previous fiscal year and reimbursement of approved instructional equipment purchased, received and paid for during the previous fiscal year (Area Vocational Centers and post-secondary only).

SAMPLE 15

STUDENT INFORMATION INPUT FORM

STUDENT INFORMATION (to be completed by student)

Enrollment Year 1978-79

Central H.S. — School Name
32 — School Code

Call — Last Name
Bonnie — First Name
A. — M.I.
113-24-431 — Student Social Security No.

70 Cliff St. Beloit WI 53512 — Permanent Address
692-4851 — Phone No.

Sex: ☒ Female ☐ Male

Date of Birth: 12/06/59

Ethnic Background:

☐ American Indian/ Alaskan Native ☐ Asian American/ Pacific Islander ☐ Black, Non-Hispanic ☐ Hispanic ☒ White, Non-Hispanic

PROGRAM STATUS (to be completed by Records Office)

LEVEL:

Secondary: ☐ 9-10 ☒ 11-12 ☐ Ungraded

Post-secondary: ☐ Associate Degree ☐ License ☐ Certificate

Adult: ☐

PROGRAM:	Vocational Program(s)	O. E. Code(s)	Hours Instruction
	OFFICE MACHINES	14.0300	800

COOP STUDENT: ☐ Yes, Vocational Program _____ ☒ No

WORK-STUDY STUDENT: ☒ Yes ☐ No

SPECIAL NEEDS INFORMATION (to be completed by Evaluation Team)

☒ HANDICAPPED:

☐ Mentally Retarded ☐ Hard of Hearing ☐ Deaf ☐ Speech Impaired
☐ Visually Handicapped ☐ Emotionally Disturbed ☒ Orthopedic Handicapped ☐ Other Health Impaired
☐ Deaf-Blind ☐ Multi-Handicapped ☐ Specific Learning Disabled

☐ LIMITED ENGLISH SPEAKING ABILITY

☒ DISADVANTAGED
☒ Economic
☐ Academic

INSTRUCTIONAL SETTING: Student receives regular program w/ ADDITIONAL ASSISTANCE by Resource AIDE

RELATED DOCUMENTATION:
Pupil Placement Team Review 9/14/77
I.E.P. on file in guidance office

FAMILY INCOME: Less than $3,000
Family receives AFDC; Student receives free lunch

Following that model, you should seek information about potentially sensitive areas (e.g., minority, gender, race, creed, age, marital status) on a separate form (perhaps matchable only by social security or other serial number). Further assure the individual by explaining why the information is sought, citing your institutional equal opportunity policies, and providing him/her with an opportunity to indicate whether such data can be included in any student or employee directory (see sample 16).

SAMPLE 16

EQUAL EMPLOYMENT OPPORTUNITY INFORMATION REQUEST

INDIANA UNIVERSITY-PURDUE UNIVERSITY AT FORT WAYNE

A memorandum originating in the Office of the Secretary, U.S. Department of Health, Education, and Welfare, states that Affirmative Action employers "are required to collect and maintain data on the race, sex, and ethnic identity of all applicants for employment." We must, therefore, ask you to complete the following questionnaire. Please note that you should sign the questionnaire and return it separately to the Affirmative Action Officer/Personnel Office. DO NOT RETURN IT TO THE RECRUITING DEPARTMENT. This questionnaire is for reporting purposes only and will not be used in the hiring decision. Thank you for your help.

NAME: _____ DATE: _____

POSITION APPLIED FOR: _____
Rank/Title

LOCATION OF POSITION: _____
Campus/School/Department

Information on this position was made available to me from the following source:

_____

CITIZENSHIP: ____ U.S. OTHER: _____
Country

ETHNIC DATA:

These categories should not be interpreted as scientific or anthropological in nature. They were developed by the Federal government in response to needs expressed by both the Executive Branch and the Congress to provide for the collection and use of compatible, nonduplicated, exchangeable racial and ethnic data by Federal agencies.

____ American Indian or Alaskan Native [A person having origins in any of the original peoples of North America, and who maintains cultural identification through tribal affiliation or community recognition.]

____ Asian or Pacific Islander [A person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This includes, for example, China, Japan, Korea, India, Pakistan, Bangladesh, Sri Lanka (formerly Ceylon), Nepal, Sikkim, Blutan, Afghanistan, the Phillippine Islands, and Samoa.]

____ Black (not of Hispanic origin) [A person having origins in any of the black racial groups.]

____ White (not of Hispanic origin) [A person having origins in any of the original peoples of Europe, North Africa, or the Middle East.]

____ Hispanic [A person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.]

BIRTHDATE: _____ BIRTHPLACE: _____ SEX: ____ Female ____ Male
Month, Day, Year City, State (or Country)

PHYSICAL HANDICAP: _____
Specify if you have any physical handicap or condition that will require special consideration in your employment.

MILITARY SERVICE: Disabled veterans and veterans of the Vietnam era are entitled to receive special consideration under the Affirmative Action Plan. If you are entitled to this consideration, please tell us and attach a statement as prescribed on the back of this form.

____ I am entitled and have attached a statement.

_____ _____
Signature of Applicant Date

NOTE: This information will be used only for the purpose of monitoring the success of our Affirmative Action Plan and will not be used to discriminate against any applicant. Please return this form in the separate envelope provided. DO NOT RETURN WITH COMPLETED APPLICATION FORM

Indiana University-Purdue University at Fort Wayne is an equal opportunity employer and activitely seeks applications from all qualified persons, whatever their sex, race, religion, national origin, age, or handicap.

You may wish to arrange through your resource person to visit an official of a state, local, or educational agency who frequently prepares reports. During your visit, you might want to seek the answers to questions you have prepared in advance, including perhaps the following:

- What reports do you routinely prepare? To whom are they submitted, and why are they required?
- Approximately what percentage of your time is consumed with the preparation of these reports? How has that time commitment changed since you have held this position?
- What shortcuts or helpful tips have you discovered that can simplify the reporting process? (Be profusely grateful when you get a response to this one!)

You may wish to arrange through your resource person to examine the instructions for one or more reports regularly prepared by administrators or teachers at a secondary or postsecondary institution.

To derive maximum benefit from this activity, try to select reports using different formats (perhaps one that uses a blank form with a tabular or chart layout and another that is primarily verbal or narrative). Also, look for reports that appear to be designed to fill various purposes: planning, funding, compliance, or control.

To structure your examination, look for specific items, including perhaps the following:

- Where are the instructions printed in relation to the blank form (on the back, on the front, separately)?
- Is a sample form provided, with hypothetical data already correctly entered?
- Does the form provide a name, phone number, or address where you can get answers to any questions the directions leave unanswered?
- Do the instructions clearly state where the report must be submitted, to whom, and by what deadline?

NOTES

The following "Case Study" decribes how an administrator prepared two reports. Read the situation and critique in writing the performance of the administrator described.

CASE STUDY

Artie Sanders is a guidance counselor at Rocktown High School. In September he was assigned the task of completing the claim forms that are to be submitted to the state department of vocational education. The superintendent emphasized that accuracy and timeliness were especially important for this report, since much of the district's supplemental funding was based on the figures contained therein. The first-semester report was due November 8.

On Friday, November 3, Mr. Sanders secured copies of all vocational class rosters from the director's office. (Four of them are shown on the next page, followed by the page of the report on which they were entered.) He then asked Charly Varner, his records clerk, to total up the number of students by grade, sex, and special category, and post those numbers on the form by Tuesday noon.

The completed forms were waiting on Mr. Sanders' desk when he returned from lunch Tuesday, but in his rush to get ready for an election-night party, Mr. Sanders didn't notice them until he came to work the next day. Elated because the school levy had passed, Mr. Sanders wasn't too concerned about the report. He finally sent it to the state capital on Friday, after hurriedly looking over Charly's figures.

In December, the state department's statistician held a series of meetings throughout the state to discuss the importance of this particular report. She stressed that all the totals should reconcile and that the reports must be in by the deadline, which was February 14 for second semester.

In early January, Mr. Sanders learned he was to attend a national conference in February. Recognizing that he would depart for St. Louis on February 14, the very day the report was due, he decided to try a new technique. This time he sent photocopies of the report form around to all the vocational instructors and asked each one to fill in the lines that applied to any classes he/she was teaching. Along with the blank, he sent a copy of the state regulations that defined the special needs categories cited on the form: DISADV (economically or academically disadvantaged), LESA (limited English speaking ability), and HDCAP (sensory or mobility impaired).

Most of the forms came into Mr. Sanders office by the February 7 deadline he had set. However, some of them bore nasty notes to the effect that "This is the tenth form I've had to fill out this week." Ignoring these comments, he compiled the numbers onto one master copy of the form. To his dismay, he noticed that the number of LESA students in the Ag Power class was now two, although the total class size remained at nine. Unable to contact the teacher (Jack Deare, who was out on a field trip), he changed the LESA figure back to a one, stuck the report into an envelope, and congratulated himself for beating the deadline by four days.

Ag Power

Mary Ball, 11, F, DSADV
Joe Coe, 11, M, DSADV, HDCPD
Bill Dill, 12, M
Joe Everly, 11, M
Fathom Hill 11, F
Bob Ingram, 12, M
Joe Jocko, 12, M, LESA
Lank Link, 11, M
Corning Owen, 11, M

Ag Machine Operations

Mabel Abel, 10, F
Joe Beck, 10, M
Jeff Cold, 9, M, DSADV
Bill Deep, 10, M
Kerry Fair, 10, M
Gerry Geppy, 9, M
Jerry Jones, 10, M, HDCPD
Kelly Lynn, 10, F, HDCPD

Nurse Aide Skills

Florence Finch, 12, F
Harriet Hansen, 12, F, DSADV
Kate Johansen, 11, F, LESA
Paul Prankman, 12, M
Sara Solomon, 11, F, HDCPD
Ramon Trinidad, 11, M, LESA
Velma Villers, 12, F, DSADV

Intro. to Health Occup.

Marianne Marx, 9, F, LESA
Ned Navarre, 10, M
Oscar Olway, 9, M
Ruth Ramirez, 9, F, LESA
Stella Sartois, 10, F, HDCPD
Thelma Taylor, 10, F, DSADV
Vicki Vance, 9, F
Wally Wallace, 10, M
Abby Yarrington, 9, F
Diane Zarducci, 10, F

"LEGAL DISTRICT NAME" Rooktown Local School District

STATE BOARD OF EDUCATION
ILLINOIS OFFICE OF EDUCATION
Program Approval and Evaluation Section

FISCAL YEAR 82 SECTION D PART II

LEA TYPE COMP
TERM 1 SEM, 81-82
REPORTING A SAMPLE

REGION IX COUNTY ALLEN
DISTRICT 2 REG SUPT

IDC 12-340 PDC 3-84

CREDIT COURSE OFFERINGS ONLY

	1 OCCUPATIONAL PROGRAMS WITH INDIVIDUAL COURSES INDENTED AND LISTED IN SEQUENTIAL ORDER BELOW EACH PROGRAM TITLE (ONE COURSE PER LINE)	2 OE CODE NUMBER	3	4 COURSE CREDIT UNITS/ HOURS	5 HIGH SCHOOL OCCUPATIONAL ORIENTATION (Typically 9 & 10) 9 M	5 F	6 10 M	6 F	7 HIGH SCHOOL OCCUPATIONAL EXPERIENCE OR TRAINING (Typically 11 & 12) 11 M	7 F	8 12 M	8 F	9 POST SECONDARY OCCUPATIONAL EXPERIENCE OR TRAINING 13 M	9 F	10 14 M	10 F	11 ADULT TRAINING FOR CREDIT M	11 F	12 STUDENTS ENROLLING AS DAY	13 EVE	14 SCHOOL	15
1	X Agricultural Mechanics	01.0300																			
2	Agricultural Power	01.0300		1					4	2	3	0							2	1	0	10
3	Agricultural Machinery Maintenance	01.0300		1																		10
4	Elect. Wiring and Controls	01.0300		1																		10
5	Agriculture Machine Operations	01.0300		1	2	0	4	2											1	0	2	10
6	Agricultural Mechanics	01.0300		½																		3
7	Welding	01.0300		½																		3
8	Orient. to Agricultural Occupations	01.0300		½																		3
9	X Nurse Aide Skills	07.0303																				
10	Nurse Aide Skills	07.0303		1					1	2	0	4							2	1	1	10
11	Health Occup. Core of Skills	07.0303		1																		10
12	Introduction to Health Occup. Core	07.0303		1	1	4	2	3											1	2	1	3
13	Orientation to Health Occupations	07.0303		½																		3
14																						
15																						
16																						
17	TOTALS				3	4	6	5	5	4	3	4							4	4	4	

SAMPLE Platform

USE 15 ENTRIES PER PAGE ____

SUBMIT FIRST THREE COPIES RETAIN LAST COPY

VE-4

Compare your completed written critique of the "Case Study" with the "Model Critique" given below. Your response need not exactly duplicate the model response; however, you should have covered the same major points.

MODEL CRITIQUE

Mr. Sanders needs to sharpen up his pencil, his work attitudes, and his consideration for faculty members. First of all, the first report was sent in three days late because he started too late to work on it. In addition, he didn't seem to take it very seriously in light of other events happening around the school. Furthermore, there were several errors on the form: the number of HDCP for Ag Power was counted wrong, as were the LESA and 12th-grade male/female count for Nurse Aide Skills. Also, the column totals were added incorrectly for DISADV.

For the second time around, Mr. Sanders had at least regained some concern for the timeliness of reports. He anticipated the problem of his impending absence, so he gave himself more time to complete the task. However, he imposed an unnecessary burden on the faculty. Since the class rosters had already been prepared and annotated with the special need information, there was no reason for him to require the teachers to provide this information again--and their chagrined remaks reflect their irritation.

The seeming discrepancy in the Ag Power total could have arisen from two to three sources. First, the definitions he sent might not have been clear (state department regulations aren't always vivid prose), so Jack Deare might have improperly classified one of his students as LESA. Second, just because the class total is still nine doesn't necessarily mean the class has the same nine students. Perhaps one of them moved away, and a new student came into the class who was indeed in the LESA category. Third, by asking the teachers to provide the summary figures, Mr. Sanders lost his ability to check the numbers against original source data (the rosters). Therefore, he was helpless when the teacher could not be reached to clarify the discrepancy.

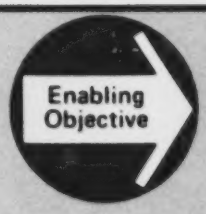
In fact, in his haste to get the report in on time this time, Mr. Sanders probably underreported the school's LESA census by one. As a result, the district would not receive all the funds to which it was entitled. In summary, Mr. Sanders' performance was not satisfactory.

Level of Performance: Your completed written critique should have covered the same major points as the "Model Critique." If you missed some points or have questions about any additional points you made, review the material in the information sheet, "Preparing and Submitting Reports for Internal and External Uses," pp. 43-56, or check with your resource person if necessary.

NOTES

Learning Experience III

OVERVIEW



After completing the required reading, critique the performance of an administrator in a given case study in preparing a cooperative agreement with a local agency.

You will be reading the information sheet, "Preparing Interagency Cooperative Agreements," pp. 65-75.

You may wish to examine copies of several types of agreements between a vocational-technical institution and some other agency.

You may wish to read one or more of the following journal articles: Abbott, "The Mansfield Formula for Worker Renewal," VocEd; Dennis, "Class at the Plant," VocEd; Lancaster and Shuford, "Employers and Educators Team Up in Tucson," Community and Junior College Journal; McGough and Manley, "Linkages Can Work," VocEd; Moed, "College with Its Own High School," Community and Junior College Journal; Stahl, "Increasing Union Participation," VocEd; and/or Wireenski, "Vocational Education and CETA Cooperate to Solve Local Manpower Program," VocEd.

continued

You will be reading the "Case Study," p. 77, and critiquing the performance of the administrator described.

You will be evaluating your competency in critiquing the administrator's performance in preparing a cooperative agreement with a local agency by comparing your completed critique with the "Model Critique," pp. 79-80.

Activity

For information about different kinds of cooperative agreements and your role in forming them, read the following information sheet.

PREPARING INTERAGENCY COOPERATIVE AGREEMENTS

Vocational-technical education is only one of several nationwide programs that provide job training and support services for youth and adults. These job training programs are being delivered with limited resources. Therefore, careful coordination is needed in the planning and delivery of vocational-technical education services to accomplish the following:

- To combine the resources of several agencies involved in vocational-technical training
- To provide for the upgrading of programs and services to individuals
- To keep vocational-technical education concurrent with social and economic needs

Multiple-agency coordination has always been assumed, but the Education Amendments of 1976 made it a requirement for educators. Specifically mentioned are national, state, and local advisory committees; national and state occupational information coordinating committees; and a committee to write the state vocational plan.

Other laws calling for interagency coordination include the following:

- Comprehensive Employment and Training Act (CETA) of 1973 and its amendments--The Youth Employment and Demonstration Project Act (YEDPA) of 1977 further requires extensive cooperation between CETA and public schools to provide year-round training and employment.
- Education for All Handicapped Children Act of 1975--This act charges state and local agencies with the responsibility of providing a free and appropriate public education for all handicapped children from ages 3-21. The act requires vocational-technical institutions to open their doors to handicapped persons who need special instructional materials, equipment, facilities, and so on.
- Rehabilitation Act of 1973 and its amendments of 1974--This act prohibits discrimination against handicapped persons in a program receiving federal monies. The 1974 amendments call upon all federal agencies to cooperate and assist in meeting the needs of the handicapped.

Legislation alone cannot guarantee effective multiple-agency coordination and cooperation. Historically, vocational-technical educators have often sought the cooperation of the public through advisory committees, craft committees, community service projects, and cooperative on-the-job training programs. However, these efforts have often lacked the involvement of related

agencies. To be successful, coordination and cooperation must be perceived as providing mutual benefits for all agencies involved. A network of related agencies must be involved--one that identifies and capitalizes on the unique role and expertise of each of them.

Who Benefits from Cooperation

The objective of all interagency coordination should be better service to the student. Instructional programs are the mechanisms by which vocational-technical educators provide people with the knowledge and skills necessary for employment. Coordination is needed so that instructional programs can undergo continual improvement in content, methods of instruction, and related services. Ultimately, the taxpayers benefit from the greater efficiency of providing educational services.

How Can These Benefits Be Secured

By specifying the different roles individuals will play, organized cooperative agreements avoid duplication, provide for uniform and integrated service delivery, and promote the maximum use of resources. The coordination of administrative functions makes it possible to plan and budget effectively, mesh the services provided by one agency with the services of others, and establish a smooth transition of services from one agency to another. Coordinated administrative functions include comprehensive planning (both annual and long range), fiscal administration, collection and storage of data, monitoring and evaluation, and the establishment of a calendar.

In developing cooperative agreements, participating agencies should use uniform terminology on all forms to assure a common understanding of the program requirements. Reports should be made on a uniform set of forms so that the basic information can be used by more than one agency.

Obviously, there are many ways a cooperative agreement can be designed. The variations depend upon the design of services, use of resources, population being served, and the numbers and kinds of agencies cooperating, among other major factors.

Types of Cooperative Agreements

Contracts. A contract is a legally binding agreement with fixed terms of compliance for both parties. For example, an educational agency might contract with a private school (e.g., cosmetology) to train students of the educational agency in a specific program. Or an educational agency might be contracted by a private industry to train, or retrain, employees of that industry in specified skills, such as coal mining safety or new equipment operation. In yet another instance, an educational agency might contract with an outside agency (such as CETA) for services. The contract must

precisely name responsibilities, duties, obligations, privileges, financial terms, and termination of the agreement (see sample 17).

Articulation statements. Articulation is used to provide sequence and continuity in curriculum and to provide growth and an uninterrupted sequence of learning experiences for students progressing through various levels of education from elementary to postsecondary. The four major components of articulation are (1) building a cooperative climate, (2) expanding communication among staff, (3) developing sequenced programs (curriculum), and (4) coordinating services such as guidance, admissions, financial aid, and placement.

Articulation statements may be drawn up between educational agencies of the same level (i.e., a secondary school and a secondary area vocational center) or between agencies of different levels (i.e., a secondary school and a community college). (See sample 18.)

Supervised work experience. Every training program that involves placing a student in a supervised work experience program (e.g., co-op training, experience-based education, apprenticeship program, or internship program) should use a training memorandum or plan to structure the experience. A cooperative training plan must include the responsibilities of the employer, the coordinator, the student, and the parent of the student (if appropriate). The plan must also outline the learning experiences to be provided to the student by the employer and the related information to be taught by the coordinator. (See sample 19.)

Mutual definition of competing service area. This agreement is written--typically between two community college districts--for the purpose of expanding educational services to a greater number of students. The agreement allows out-of-district students to attend community colleges on a tuition-free basis in the event that a desired program is unavailable in the student's home district. This type of agreement names specific programs in which students may enroll in each district. (See sample 20.)

Multiagency agreements. Often clients can best be served by cooperative agreements between and among more than two agencies, probably of different types. Multiagency contracts must clearly define the responsibilities of all the agencies involved. (See sample 21.)

Steps in Preparing Agreements

Before you as a local administrator enter into an interagency agreement, you must identify the educational institution's objectives for entering into the agreement. Once the objectives have been determined, you must match these with services provided by different agencies. One way to determine the available services is to examine similar agreements used by other institutions or to compare the objectives of those agreements with the institution's predetermined objectives.

SAMPLE 17

OUTLINE OF AGREEMENT TO PROVIDE INSTRUCTION

AGREEMENT FOR COSMETOLOGY TRAINING
BETWEEN
COMMUNITY COLLEGE DISTRICT No. 529
AND
COLBORN'S ACADEMY OF BEAUTY CULTURE, INC.

This Agreement revised and made this 1st day of July, 1977, between BOARD OF TRUSTEES OF COMMUNITY COLLEGE DISTRICT No. 529, COUNTIES OF RICHLAND, CLARK, CLAY, CRAWFORD, CUMBERLAND, EDWARDS, HAMILTON, JASPER, LAWRENCE, WABASH, WAYNE, and WHITE, and STATE OF ILLIONIS organized and existing under the laws of the State of Illinois (hereinafter referred to as the "District") with its principle office at Olney, Illinois, with three campus locations being Lincoln Trail College at Robinson, Illiois, Olney Central College at Olney, Illinois, and Wabash Valley College at Mt. Carmel, Illinois, and COLBORN'S ACADEMY OF BEAUTY CULTURE, INC., an Illinois Corporation, owner and operator of the Colborn's Academy of Beauty Culture, Inc., which is presently located at Mt. Carmel, Illinois, (hereinafter referred to as the "Beauty School"):

WHEREAS, the District and the Beauty School wish to mutually participate in a vocational training program in cosmetology; and

WHEREAS, under said program the District will enroll a designated number of new students not to exceed thirty (30) per college quarter with the Beauty School which shall maintain accreditation and approval by the Illinois Department of Registration and Education and meet all statutory requirements of the State of Illinois. The said Beauty School will furnish instruction and clinical training to such students in cosmetology under the terms and conditions as set forth herein:

NOW, THEREFORE, IN CONSIDERATION OF THE MUTUAL PROMISE OF THE PARTIES, EACH BARGAINED AND GIVEN IN EXCHANGE FOR THE OTHER, IT IS HEREBY MUTUALLY AGREED AS FOLLOWS [1-2 paragraphs would be provided in the following areas]:

I. ADMINISTRATIVE RESPONSIBILITY
II. STUDENT ENROLLMENT
III. SUPERVISION, INSTRUCTION, ON-SITE VISITS, RECORDS, ETC.
IV. TUITION, TERM AND RENEWAL
V. MODE OF PAYMENT AND CANCELLATION
VI. CLASSES AND HOURS
VII. REGISTRATION AND QUALIFICATION OF STUDENTS
VIII. DUTIES OF STUDENTS
IX. DUTIES OF BEAUTY SCHOOL
X. PRIVILEGES OF BEAUTY SCHOOL
XI. SUPPLIES
XII. LIABILITY INSURANCE, ETC.
XIII. NOTICES AND DEMANDS
XIV. AMENDMENTS
XV. PRIOR AGREEMENTS, ETC.
XVI. CAPTIONS
XVII. TERM OF CONTRACT
XVIII. BENEFIT
XIX. ENTIRE AGREEMENT

SAMPLE 18

TYPICAL ARTICULATION AGREEMENT

VOCATIONAL/CAREER EDUCATION COOPERATIVE ARRANGEMENT

Wabash Valley College agrees to enter into a program of articulation with Little Wabash Area Vocational Center and to facilitate the articulation program by carrying out the following tasks:

A. Appointing a representative to an Articulation Roundtable and other councils and committees agreed on

B. Empowering the representative to the Articulation Roundtable to act in the name of the school or district

C. Permitting the representative to the Articulation Roundtable to report to the school/district staff on a regular basis

D. Being represented at all Roundtable, council, and committee meetings

E. Cooperating with all decisions made by the Articulation Roundtable with at least a majority vote

F. Keeping its own staff informed about the Articulation Roundtable and its activities

G. Sharing information as requested by the Articulation Roundtable

H. Responding to surveys initiated by the Articulation Roundtable

I. Sharing in-district and in-school materials as requested by the Articulation Roundtable

J. Sharing facilities and resources (e.g., materials and personnel) when feasible and desirable

K. Changing in-district and in-school vocational/career education programs and services only after notifying other members of the Articulation Roundtable of intent to do so

L. Including other members of the Articulation Roundtable as observers (and/or participants) on committees making program decisions

M. Notifying other member districts (schools) of vocational/career education program revisions as soon as they have been planned

N. Permitting (or inviting) visitors from other member schools/districts to attend staff and department meetings

O. Permitting teacher visits as requested by the Articulation Roundtable

P. Permitting teacher exchanges as requested by the Articulation Roundtable

Q. Holding joint inservice education as requested by the Articulation Roundtable

R. Hosting a fair share of meetings and paying meeting costs

S. Adopting a joint calendar

T. Cooperating with the "Two-Year Articulation Plan" developed by Articulation Roundtable

Signature _____ Date _____
(Chief Administrator)

SAMPLE 19

COOPERATIVE TRAINING MEMORANDUM

ILLINOIS STATE BOARD OF EDUCATION
Department of Adult, Vocational and Technical Education
Program Approval and Evaluation Section
100 North First Street
Springfield, Illinois 62777

TRAINING MEMORANDUM
Cooperative Occupational Education

INSTRUCTIONS: Complete 3 copies (1 copy for employer, 1 for student, 1 for teacher-coordinator). The copy for State Files

NAME OF PROGRAM

SCHOOL	DISTRICT	CITY	
STUDENT	DATE OF BIRTH / /	AGE	SOCIAL SECURITY NUMBER
COMPANY NAME	ADDRESS		PHONE
TYPE OF BUSINESS	JOB TITLE		DE CODE
JOB SUBJECT TO FEDERAL OR STATE MINIMUM WAGE ☐ Yes ☐ No – ☐ State ☐ Federal	STATE LICENSE TO EMPLOY STUDENT LEARNER ON FILE ☐ Yes ☐ No		
WORKING HOURS (Daily) ____ to ____ (Saturday or Sunday) ____ to ____	Wages Per Hour		
DURATION OF COURSE OF TRAINING	EMPLOYMENT CERTIFICATE (WORK PERMIT) OR CERTIFICATE OF AGE ON FILE ☐ Yes ☐ No		

In order to carry on program, it is advisable that all parties concerned agree to the following responsibilities:

EMPLOYER'S RESPONSIBILITIES

The student will be placed on the above named job for the purpose of providing work experience and career exploration and will be given work of instructional value. (A list of work experiences and information topics should be prepared by the employer and coordinator.)

The student's work activity will be under the close supervision of an experienced and qualified person. The work will be performed under safe and hazard free conditions.

The student will receive the same consideration given employees in regard to safety, health, social security, general work conditions and other regulations of the firm.

The Coordinator will be notified if difficulties arise, changes are necessary, a lay-off or termination of employment seems likely to happen.

COORDINATOR'S RESPONSIBILITIES

The Coordinator will, with the assistance of the employer or someone delegated by him, prepare a training plan or outline of processes to be learned on the job and related topics to be taught in the school. These items to be listed on reverse side of this memorandum.

The Coordinator will make provision for all cooperative students to receive the regularly scheduled related instruction.

The Coordinator will visit each student at least once per month at the work station and will become acquainted with the person to whom the student is responsible while on the job.

The Coordinator will endeavor to adjust all complaints with the cooperation of all parties concerned, and will have the authority to transfer or withdraw a student.

The Coordinator will make plans to meet with each student's parent or guardian several times during the school year.

STUDENT'S RESPONSIBILITIES

The student will follow the rules set up by the school, employer, and coordinator.

The student will call the school office and his employer when he will be absent.

The student will not be allowed to work on days when he is absent from school.

PARENT'S OR GUARDIAN'S RESPONSIBILITIES

The (parents) or (guardians) agree to assume the responsibility to see that the student follows this agreement.

It shall be agreed that parties participating in the program will not discriminate in employment opportunities on the basis of race, color, sex, national origin or handicap.

Date	Signature of Student	Date	Signature of Employer
Date	Signature of Parent or Guardian	Date	Signature of Teacher-Coordinator

ISBE 15-06 (6-80)

TRAINING OUTLINE

JOB EXPERIENCES THE EMPLOYER MAY GIVE THE TRAINEE	RELATED INFORMATION THE COORDINATOR MAY TEACH THE STUDENT

Individual study references available:

TRAINING STATION	CLASSROOM
1	1
2	2
3	3
4	4
5	5

Name of Trainer(s)

SAMPLE 20

INTERDISTRICT AGREEMENT

A JOINT AGREEMENT FOR EDUCATION COOPERATION
BETWEEN
BELLEVILLE AREA COLLEGE, DISTRICT #522
AND
ILLINOIS EASTERN JUNIOR COLLEGES, DISTRICT #529

This agreement made this 17th day of November 1977, and entered into between the Board of Trustees and Chief Administrative Office of BELLEVILLE AREA COLLEGE, District #522, Counties of St. Clair, Madison, Monroe, and Washington, and State of Illinois, hereinafter referred to as "BELLEVILLE AREA COLLEGE, District #522," and the Board of Trustees and Chief Administrative Office of Community College District #529, Counties of Richland, Clark, Clay, Crawford, Cumberland, Edwards, Hamilton, Jasper, Lawrence, Wabash, Wayne, and White, and State of Illinois, hereinafter referred to as "ILLINOIS EASTERN JUNIOR COLLEGES, District #529." For the purpose of this agreement, the district of the student's residence will be referred to as "The Sending District" and the college providing the educational program will be referred to as "The Receiving District."

I. PURPOSE

It is the desire of the districts entering into this agreement to expand educational services to the greatest number of students. This agreement is one of the significant means of implementing the State of Illinois Master Plan--Phase IV by accomplishing a feasible method of cooperation between two community college districts.

II. PROGRAMS TO BE INCLUDED

BELLEVILLE AREA COLLEGE, District #522, agrees to accept students from ILLINOIS EASTERN JUNIOR COLLEGES, District #529, in the following programs:

Name of Program	Degree or Certificate
Horticulture	A.A.S./Certificate
Aviation Pilot Training	A.A.S.
Aviation Maintenance Technology	A.A.S.
Aviation Electronics - Avionics	A.A.S./Certificate
Medical Assistants Program	A.A.S./Certificate
Fire Science	A.A.S./Certificate
Medical Laboratory Technician	A.A.S.
Medical Records Technician	A.A.S.
Physical Therapy Assistant	A.A.S.
Radiologic Technology	A.A.S.
Respiratory Therapy Technician	Certificate
Operating Room Technician	Certificate
Professional Horse Technology	A.A.S./Certificate
Farrier Science	Certificate

ILLINOIS EASTERN JUNIOR COLLEGES, District #529, agrees to accept students from BELLEVILLE AREA COLLEGE, District #522, in the following programs:

Name of Program	Degree or Certificate
LTC - Culinary Arts/Restaurant Management	A.A.S.
LTC - Petroleum Technology	A.A.S.
WVC - Agricultural Mechanics	A.A.S.
WVC - Conservation & Outdoor Recreation	A.A.S.
WVC - Diesel & Hydraulics Technnology	A.A.S.
WVC - Child-Care Services	A.A.S.
WVC - Coal Mining Technology	Certificate
WVC - Radio-T.V. Broadcasting	A.A.S.
WVC - Telecommunications	A.A.S./Certificate

III. STUDENT ENROLLMENT AND RESPONSIBILITY

IV. DISTRICT'S RESPONSIBILITY

V. FINANCE

VI. CATALOG

VII. REVIEW OF AGREEMENT

VIII. TERMINATION

[Sections III to VIII would be fully developed in actual document]

SAMPLE 21

TYPICAL CONTRACT FOR SUPPORTING SERVICES

SUPPLEMENTAL
COOPERATIVE AGREEMENT BETWEEN ILLINOIS FARMERS UNION
(I.F.U.) #5, BUSHNELL-PRAIRIE CITY HIGH SCHOOL, AND
DEPARTMENT OF REHABILITATION SERVICES (DORS)

(ATTACH TO PURCHASE OF SERVICE AGREEMENT)

OVERVIEW

This agreement is a joint working agreement between staff of agreeing agencies to commit and provide services to disabled individuals of the Special Education Program at Bushnell-Prairie City High School.

1. Illinois Farmers Union #5 (CETA) will provide intake assessment for the participants identified for the program by the school coordinator to determine if they are CETA-eligible.

2. CETA's Employment Development Plan (EDP); DORS' Individualized Written Rehabilitation Program (IWRP); and Special Education's Individualized Education Plan (IEP) should all be prepared in coordination with each of the agencies.

3. Illinois Farmers Union #5 work experience coordinators and DORS' Region 3 counselor and school coordinator will work cooperatively to determine what program funds would best fulfill the needs of each individual participant, creating a coordinated diagnostic package. The participants will be DORS clients, as well as CETA participants.

4. The school prevocational coordinator will provide the daily counseling necessary to all students in the program, coordinating with DORS and CETA. The Region 3 DORS counselor and CETA counselor will provide team counseling to the CETA/DORS participants, approving appropriate work training sites. Each of the counselors is required to supply necessary forms to the other agency.

5. The Region 3 placement coordinator will assist as needed in placement services to the participants to find suitable employment for the handicapped following training. The counselor will provide CETA reports to I.F.U. #5 as required and agrees to work cooperatively with the CETA program agent in the placement of the participants.

6. Bushnell-Prairie City High School agrees to follow the recommended work programming for its students established cooperatively with I.F.U. #5 and DORS and to provide assistance and reports to I.F.U. #5 and DORS as necessary.

7. I.F.U. #5, Bushnell-Prairie City High School, and DORS will establish a program team to meet at least once each quarter to discuss programming and training for the participants and cooperatively establish steps for appropriate training and eventual work placement. The members of this team will be the same as the liaison team.

8. _____ _____, I.F.U. #5; _____ _____, Bushnell-Prairie City High School; and _____ _____, DORS, will serve as a cooperative review team. This team will evaluate the program and determine the success of the cooperative programming. The team will also include the decision makers if any programming conflict cannot be resolved on the programming level.

Some of the agencies and groups that should be considered and examined include the following:

- Vocational education
- Special education
- General education
- Supportive services (guidance)
- Rehabilitation
- Parents
- Employers/Unions
- Advisory council
- Service agencies (e.g., employment service, CETA, mental health)

After the institution's objectives have been matched with the services available from other agencies, you should consult with the administrators of any agencies affected by the proposed agreement. An interagency agreement is only of value when it is advantageous to both parties. During the consultation with other administrators, similar agreements may be used as a guide for drafting a tentative agreement.

Interagency agreements must be structured firmly enough to assure delivery of appropriate services but be flexible enough to permit modification as the need arises. While each agreement will necessarily be different, likenesses are evident. Each agreement must contain certain provisions. A suggested format includes the following sections:

- Preamble--This introduction should include the philosophical intent, legal basis, and time lines of the agreement.
- Administration--This section should include a flow chart indicating linkages at all necessary levels--state, regional, and local. The chart should also depict routes of communication.
- Services--Included in this section are such items as who the clients are to be, ages, grade levels, types of instructional components, and which agency is responsible for each service.
- Linkages--This section provides for linkages with agencies other than the primary area to be used, as the need arises. Possible agencies to be mentioned include mental health, social services, and public health.
- Agreement--The commitments in the preamble should be elaborated and expanded. Also included would be definitions and eligibility requirements, and the services should be expanded upon. Planning and evaluation should be clearly spelled out, and allowance should be made for changes suggested by the evaluation.

- Statements of confidentiality and assurances--This specifies the types of information to be shared among agencies and includes assurance statements providing procedural safeguards.
- Signatures--The chief administrator and/or board president of each agency must sign and date the agreement.

Following the rough formulation of the agreement, the draft and related documents should be reviewed by the educational agency's legal advisor, who should prepare the final document. The final agreement should then be submitted to the appropriate governing boards for deliberation and formal adoption.

You may wish to examine copies of some actual cooperative agreements involving vocational-technical institutions. Your resource person may be able to help you secure these documents for review. Try to study a variety of agreements: for example, one between two educational institutions, one between a vocational-technical institution and a government agency, and one between a vocational-technical agency and an industry or business providing a site for some type of supervised student work experience.

As you examine these documents, look for some specific provisions, including perhaps the following:

- What responsibilities or tasks are typically fulfilled by the vocational-technical institution?
- Is a transfer of funds involved? On what basis is each party paid?
- What type of coordination is established between the parties? Is it informal, or is it highly structured?

In order to increase your exposure to a variety of cooperative agreements and to learn to what extent they have been successful, you may wish to read one or more of the following articles: Abbott, "The Mansfield Formula for Worker Renewal," VocEd; Dennis, "Class at the Plant," VocEd; Lancaster and Shuford, "Employers and Educators Team Up in Tucson," Community and Junior College Journal; McGough and Manley, "Linkages Can Work," VocEd; Moed, "College with Its Own High School," Community and Junior College Journal; Stahl, "Increasing Union Participation," VocEd; and/or Wiegenski, "Vocational Education and CETA Cooperate to Solve Local Manpower Program," VocEd.

As you study these references, ask yourself the following kinds of questions:

- Were the objectives of each party involved in the cooperative agreement clear, complementary, and mutually supporting? Were they accomplished?
- Which individual within the vocational-technical institution took a leading role in developing the cooperative agreement? What tactics did he/she employ to bring about the agreement?
- Can any of the practices the cooperating parties used be put into practice in the institution where you are currently (or hope to be) situated?

The following "Case Study" describes how a vocational education administrator prepared a cooperative agreement involving his institution. Read the situation and critique in writing the performance of the administrator described.

CASE STUDY

Joe Nartmough is the director of vocational education at Carnsville High School, a small rural school with an enrollment of approximately 600 students in grades 9-12. He has for some time been concerned about the large number of vocational students who drop out of high school to go to work for economic reasons. Most of these dropouts find employment only as unskilled laborers in the small manufacturing plants of the community; few of them leave the area.

One evening while he and his wife were entertaining friends, Mr. Nartmough and one of the guests, Mr. Wirts, were discussing this very problem. Mr. Wirts suggested that, since he worked for the county employment and training office (funded through CETA), he thought he could develop a joint program whereby the students who had dropped out could be provided with a stipend from CETA to attend vocational classes at the high school.

The following week Mr. Nartmough and Mr. Wirts met at the employment and training office and drafted an agreement in contract form. Under the terms of this document, the CETA office would provide a stipend to the students for living expenses and would pay tuition to the school. The school, in turn, would provide the facilities, equipment, instructors, and support staff needed to train and counsel students.

After refining the draft, Mr. Nartmough submitted it to his superintendent, Dr. Alice Hoover, for her approval. As soon as she signed it, he considered the agreement official and began to implement it.

NOTES

Compare your completed written critique of the "Case Study" with the "Model Critique" given below. Your response need not exactly duplicate the model response; however, you should have covered the same major points.

MODEL CRITIQUE

On the positive side, Mr. Nartmough did demonstrate his concern for student problems and saw the opportunity that arose from informal (in this case, social) relationships with a colleague from the community. He followed through on this matter and demonstrated that the school was willing to draw on other resources and to cooperate with outside agencies.

Nevertheless, his efforts would have been more successful if he had observed some important principles of interagency cooperation.

To start with, Joe Nartmough did not identify all of the institution's related objectives before setting out to correct the dropout problem. Only one objective was mentioned--that of reducing the number of dropouts.

When the possibility of the CETA office's providing a stipend was mentioned, Mr. Nartmough did not study any other options, nor did he contact any other agencies. (Other possibilities might have included cooperative training or financial assistance for the students from other firms or organizations.)

There likewise is no evidence that Mr. Nartmough or Mr. Wirts compared their draft with other similar documents between schools and CETA offices, or agreements involving schools in any form. Furthermore, they failed to ask for review of the document by an attorney.

More importantly, Mr. Nartmough failed to involve his colleagues within the institution. No instructors, guidance personnel, or other support staff were consulted to see if they might have had suggestions for alternate solutions or might have known of ways to improve the contract while it was still in draft form. We can expect that he would encounter problems and resistance when he attempted to implement the plan--staff members tend to be more supportive of programs that they have had a part in developing than those that are suddenly "sprung on them."

In fact, this is a hazard of relying too much on informal contacts with outside agencies. A more deliberate, formal effort at articulation is more likely to involve those teachers and administrators who would be affected or interested in the shared services or cooperative programs.

Last of all, neither Mr. Nartmough nor Dr. Hoover submitted the contract to the board for its approval. Without its official action as the governing body of the institution, the agreement is null and void and cannot be legally carried out.

Level of Performance: Your completed critique should have covered the same major points as the "Model Critique." If you missed some points or have questions about any additional points you made, review the material in the information sheet, "Preparing Interagency Cooperative Agreements," pp. 65-75, or check with your resource person if necessary.

Learning Experience IV

FINAL EXPERIENCE

While working in an actual administrative situation, cooperate with governmental and community agencies.*

As part of your administrative responsibility, cooperate with governmental and community agencies. This will include--

- providing comments and information to assist legislators, rule makers, and planners in making policy changes
- maintaining channels of communications with governmental and community officials
- submitting routine and special reports as required
- preparing formal cooperative agreements
- participating in informal cooperative arrangements

NOTE: As you complete each of the above activities, document your actions (in writing, on tape, through a log) for assessment purposes.

continued

*If you are not currently working in an actual administrative situation, this learning experience may be deferred, with the approval of your resource person, until you have access to an actual administrative situation.

FINAL EXPERIENCE continued

Arrange to have your resource person review your documentation. If possible, arrange to have your resource person observe your performance at a point when you are directly involved in cooperating with governmental and community agencies.

Your total competency will be assessed by your resource person, using the "Administrator Performance Assessment Form," pp. 83-85.

Based upon the criteria specified in this assessment instrument, your resource person will determine whether you are competent in cooperating with governmental and community agencies.

Name _____

Date _____

ADMINISTRATOR PERFORMANCE ASSESSMENT FORM

Cooperate with Governmental and Community Agencies

Directions: Indicate the level of the administrator's accomplishment by placing an X in the appropriate box under the LEVEL OF PERFORMANCE heading. If, because of special circumstances, a performance component was not applicable, or impossible to execute, place an X in the N/A box.

	LEVEL OF PERFORMANCE					
	N/A	None	Poor	Fair	Good	Excellent
While providing comments and information to assist legislators, rule makers, and planners in making policy changes, the administrator:						
1. established a system to keep informed about the introduction of legislation, proposed rule making, or tentative plans.....	☐	☐	☐	☐	☐	☐
2. provided comments and information in one or more of the following ways, as appropriate:						
a. testifying before a legislative or administrative body.....	☐	☐	☐	☐	☐	☐
b. using the services of a professional organization to inform legislators or officials of matters relating to pending bills, rules, or plans.....	☐	☐	☐	☐	☐	☐
c. submitting information in written form to legislators or officials.....	☐	☐	☐	☐	☐	☐
d. participating in meetings and conferences dealing with local and state plans for vocational-technical education or related areas.....	☐	☐	☐	☐	☐	☐

LEVEL OF PERFORMANCE

	N/A	None	Poor	Fair	Good	Excellent
While maintaining channels of communication with governmental and community officials, the administrator:						
6. developed and maintained an up-to-date roster of relevant legislators, policy makers, and administrative officials at local, state, and federal levels.....	☐	☐	☐	☐	☐	☐
7. exchanged visits with those officials with whom important transactions most often take place.....	☐	☐	☐	☐	☐	☐
While submitting routine and special reports to other agencies, the administrator:						
8. designed, used, or modified local record-keeping and data systems so as to be compatible with formats used by governmental agencies.	☐	☐	☐	☐	☐	☐
9. complied with reporting standards concerning form and format.....	☐	☐	☐	☐	☐	☐
10. carefully checked reports for accuracy and completeness.....	☐	☐	☐	☐	☐	☐
11. submitted reports on or before established deadlines.....	☐	☐	☐	☐	☐	☐
12. protected the confidentiality of source information upon which reports were based.....	☐	☐	☐	☐	☐	☐
While preparing formal cooperative agreements with local governmental, administrative, or educational agencies, the administrator:						
13. considered the objectives and resources of all agencies involved in the agreement.....	☐	☐	☐	☐	☐	☐
14. secured assistance and comments from colleagues in comparable institutions who had experience with similar agreements.....	☐	☐	☐	☐	☐	☐
15. consulted with instructors and others likely to be affected by the proposed agreement.....	☐	☐	☐	☐	☐	☐

	LEVEL OF PERFORMANCE					
	N/A	None	Poor	Fair	Good	Excellent
16. subjected all proposed agreements to legal scrutiny.....	☐	☐	☐	☐	☐	☐
17. submitted proposed agreements to the board in time to allow deliberation before formal approval.....	☐	☐	☐	☐	☐	☐
<u>While participating in informal cooperative agreements, the administrator</u>:						
18. joined or attended the meetings of organizations of administrators or officials having related duties in a community or state.....	☐	☐	☐	☐	☐	☐
19. exchanged visits or tours with colleagues in other institutions, other communities, or at different levels of government.....	☐	☐	☐	☐	☐	☐

<u>Level of Performance</u>: All items must receive N/A, GOOD, or EXCELLENT responses. If any item receives a NONE, POOR, or FAIR response, the administrator and resource person should meet to determine what additional activities the administrator needs to complete in order to reach competency in the weak area(s).

NOTES

Additional Recommended References

Campbell-Thrane, Lucille, and Jahnke, Jessica Jo. *Building Partnerships–CBOs, CETA, and Vocational Education.* RD 209. Columbus, OH: The National Center for Research in Vocational Education, The Ohio State University, 1981.

Gilder, Jamison, and Rocha, Jessica. "10,000 Cooperative Arrangements Serve 1.5 Million." *Community and Junior College Journal.* 51 (November 1980): 11-17.

Lamar, Carl F., ed. *Comprehensive Planning for Vocational Education: A Guide for Administrators.* Arlington, VA: The American Vocational Association, 1978.

Starr, Harold; Maurice, Clyde; Merz, Harold; and others. *Coordination in Vocational Education Planning: Barriers and Facilitators.* RD 187. Columbus, OH: The National Center for Research in Vocational Education, The Ohio State University, 1980.

Competency-Based Administrator Education Materials

LEADERSHIP & TRAINING (LT) SERIES

Category A: Program Planning, Development, and Evaluation

- LT-A-1 Develop Local Plans for Vocational Education: Part I
- LT-A-2 Develop Local Plans for Vocational Education: Part II
- LT-A-3 Direct Program Evaluation

Category B: Instructional Management

- LT-B-1 Direct Curriculum Development
- LT-B-2 Guide the Development and Improvement of Instruction
- LT-B-3 Manage the Development of Master Schedules

Category C: Student Services

- LT-C-1 Manage Student Recruitment and Admissions
- LT-C-2 Provide Systematic Guidance Services
- LT-C-3 Maintain School Discipline
- LT-C-4 Establish a Student Placement Service and Coordinate Follow-up Studies

Category D: Personnel Management

- LT-D-1 Select School Personnel
- LT-D-2 Supervise Vocational Education Personnel
- LT-D-3 Evaluate Staff Performance
- LT-D-4 Manage School Personnel Affairs

Category E: Professional and Staff Development

- LT-E-1 Appraise the Personnel Development Needs of Vocational Teachers
- LT-E-2 Provide a Staff Development Program
- LT-E-3 Plan for Your Professional Development

Category F: School-Community Relations

- LT-F-1 Organize and Work with a Local Vocational Education Advisory Council
- LT-F-2 Promote the Vocational Education Program
- LT-F-3 Involve the Community in Vocational Education
- LT-F-4 Cooperate with Governmental and Community Agencies

Category G: Facilities and Equipment Management

- LT-G-1 Provide Buildings and Equipment for Vocational Education
- LT-G-2 Manage Vocational Buildings and Equipment
- LT-G-3 Manage the Purchase of Equipment, Supplies, and Insurance

Category H: Business and Financial Management

- LT-H-1 Prepare Vocational Education Budgets
- LT-H-2 Identify Financial Resources for Vocational Education
- LT-H-3 Develop Applications and Proposals for Funding Vocational Education

Category I: Program Improvement

- LT-I-1 Use Information Resources to Help Improve Vocational Education Programs
- LT-I-2 Use Inquiry Skills to Help Improve Vocational Education Programs

Supportive Materials

- Guide to Vocational-Technical Education Program Alternatives: Secondary and Postsecondary—An Introduction
- Guide to Using Competency-Based Vocational Education Administrator Materials
- Resource Person's Guide to Implementing Competency-Based Administrator Education Concepts and Materials
- An Introduction to Competency-Based Administrator Education (slide/audiotape)

For information regarding availability and prices of these materials contact—AAVIM, American Association for Vocational Instructional Materials, 120 Driftmier Engineering Center, University of Georgia, Athens, Georgia 30602, (404) 542-2586.

ISBN 0-89606-117-5